

Barnes



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AUG 08 1990

RECEIVED

Reply To:
Attn Of: So-125

AUG 8 - 1990

HEARINGS CLERK
EPA—REGION X

Dana Westenhaver
W.I. Forest Products
4000 Kruse Way Place #2-355
Lake Oswego, Oregon 97035

Re: In the Matter of: W.I. Forest Products,
Toxic Substance Control Act Docket No. 1090-03-23-2615

Dear Mr. Westenhaver:

Enclosed is a conformed copy of the Consent Agreement and Final Order (CAFO) which the Acting Regional Administrator signed on August 7, 1990. The original CAFO is filed with the Regional Hearing Clerk.

Pursuant to the CAFO, payment of the civil penalty of \$8,762.00 is due no later than September 6, 1990. Please ensure the payment is made in the manner specified in Paragraph 11. In addition, the conditions in Paragraph 12 require timely satisfactions.

The Environmental Protection Agency thanks you for your cooperation in reaching a satisfactory resolution in this matter.

Sincerely,

Juliane R. B. Matthews
Juliane R. B. Matthews
Assistant Regional Counsel

Enclosure

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RECEIVED

AUG 8 - 1990

HEARINGS CLERK
EPA—REGION X

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF:

W.I. FOREST PRODUCTS,

Respondent.

)
) Docket No. 1090-03-23-2615
)
)

) CONSENT AGREEMENT AND
) FINAL ORDER
)
)

PRELIMINARY STATEMENT

1. This administrative proceeding for the assessment of a civil penalty was instituted pursuant to Section 16(a) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2615(a). The proceeding was commenced by a Complaint and Notice of Opportunity for Hearing (Complaint) issued on April 6, 1990. An informal settlement conference was held on May 9, 1990. As a result of information exchanged during and subsequent to the settlement conference, the Parties agree to resolve this matter by the execution of this Consent Agreement and Final Order.

CONSENT AGREEMENT AND
FINAL ORDER - Page 1

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(a) admits the jurisdictional allegations of the Complaint;

(b) neither admits nor denies the Findings of Fact contained in this Order;

(c) neither concedes nor contests the Conclusions of Law contained in this Order;

(d) consents to the assessment of the stated civil penalty; and

(e) explicitly waives its right to request an adjudicatory hearing regarding any provisions contained herein, or appeal of this proceeding.

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4. On October 11, 1989, an EPA inspection was performed at the W.I. Forest Products. Respondent was found to have violated the PCB regulations relating to oil filled electrical equipment.

CONSENT AGREEMENT AND
FINAL ORDER - Page 2

1 herein as Findings of Fact.

2 6. Based upon a review of the information obtained
3 from the inspection and from the settlement discussions, EPA has
4 determined that:

- 5 a. the violations stand as alleged in the
6 Complaint currently on file in this matter;
7 b. analysis subsequent to the inspection indicated
8 violation one is a technical violation; and
9 b. the Respondent's action to dispose of a PCB
10 transformer while it still has useful life goes
11 beyond what is required under the PCB regulations
12 and will result in an extra expense to the
13 Respondent.

14 CONCLUSIONS OF LAW

15 7. Based on the foregoing and pursuant to the
16 authority of TSCA Section 16(a)(2), 15 U.S.C. § 2615(a)(2), EPA
17 hereby determines that Respondent has violated TSCA Section 15,
18 15 U.S.C. § 2614, and the regulations promulgated thereunder, and
19 thereby has incurred civil liability to EPA pursuant to TSCA
20 Section 16, 15 U.S.C. § 2615(a).

21
22 ORDER

23 IT IS HEREBY ORDERED AND ADJUDGED as follows:

24 8. Respondent is assessed a penalty in the amount of
25 TWELVE THOUSAND FIVE HUNDRED DOLLARS (\$12,500.00).

26 9. Respondent shall pay EIGHT THOUSAND SEVEN HUNDRED

1 AND SIXTY TWO DOLLARS (\$8,762.00) of the imposed penalty no later
2 than thirty (30) days from the date of this Order by mailing a
3 certified check or money order, payable to the United States
4 Treasurer, and a transmittal letter giving the Respondent's name,
5 address, and this Docket Number, to the following:

6 U.S. Environmental Protection Agency, Region 10
7 (Region 10 Hearing Clerk)
8 P.O. Box 360903M
9 Pittsburgh, Pennsylvania 15251

10 with a copy of the check and transmittal letter to:

11 Regional Hearing Clerk
12 Office of Regional Counsel
13 U.S. EPA, Region 10
14 1200 Sixth Avenue, SO-125
15 Seattle, Washington 98101

16 10. The remaining portion of the imposed penalty, THREE
17 THOUSAND SEVEN HUNDRED AND THIRTY EIGHT DOLLARS (\$3,738.00), is
18 suspended and deferred to nine (9) months from the entry of this
19 Order at which time it shall be immediately due and payable
20 together with all accrued interest without further proceedings,
21 notice, or order EXCEPT as otherwise provided in the following
22 Paragraph.

23 11. The suspended and deferred payment portion of the
24 penalties imposed above shall be wholly remitted and excused
25 automatically nine (9) months from the entry of this Order if the
26 affirmative conditions or events specified in the following
27 paragraph occur and occur on time.

28 12. Within nine (9) months from the entry of this
Order, Respondent shall file with the Regional Hearing Clerk an

1 affidavit and appropriate documentation to verify that the
2 Respondent has incurred actual disposal cost of at least
3 \$7,476.00 on the early disposal of regulated PCB equipment.
4 Documentation of the early disposal shall include copies of the
5 disposal certificates and waste manifests.

6 13. The documentation required by Paragraph 12 shall
7 be sent to:

8 U.S. Environmental Protection Agency
9 Region 10 - M/S AT-083
10 1200 Sixth Avenue
Seattle, Washington 98101
Attn: Elaine Barrick

11 14. Upon completion of the condition specified in
12 Paragraph 12, payment of the suspended penalties shall remain
13 forever deferred. If the conditions are not satisfactorily
14 completed, the penalties, or such portion as EPA deems
15 appropriate, will become payable together with interest to EPA at
16 the address provided in Paragraph 9. The burden of proving that
17 payment of those penalties remains deferred is placed on the
18 Respondent.

19 15. No later than thirty (30) days after the
20 documentation specified in Paragraph 12 has been filed, EPA must
21 file a statement, with supporting reasoning, contending that one
22 or more of the conditions covered by the documentation has not
23 been met, or EPA is deemed to have waived, for civil purposes
24 only, its right to make such a contention. If EPA files any such
25 disputing statement on time, then each party may proceed as
26 otherwise permitted by law. If EPA files any such statement

1 later or omits filing any statement, then for purposes of this
2 Order the penalties which are suspended and deferred by Paragraph
3 10 above shall be deemed permanently suspended, deferred and
4 remitted.

5 16. Respondent's failure to comply with any provision
6 of this Order, including timely payment of the stipulated
7 penalty, shall render the entire stipulated penalty, less any
8 amount already paid, immediately due and owing and it shall be
9 paid immediately in the manner provided in Paragraph 9. Any such
10 unpaid amounts may be liquidated and made certain by motion and
11 notice filed with the court to which this Order is submitted for
12 judgment and collection. Such motion and notice may be served on
13 the Respondent or its current legal representative herein and
14 shall be effective if so served. Pursuant to TSCA Section
15 16(a)(4)(A), 15 U.S.C. § 2615(a)(4)(A), the validity, amount, and
16 appropriateness of the penalty is not subject to review in any
17 judicial collection proceedings.

18 17. On any amount overdue under either Paragraph 9 or
19 Paragraph 10, interest shall accrue at the rate established by
20 the Secretary of the Treasury pursuant to 31 U.S.C. § 3717.
21 Interest will begin to accrue from the date that the payment of
22 money was due.

23 DATED this 7 day of August, 1990.

24 

25 THOMAS P. DUNNE
26 Acting Regional Administrator

1 Stipulated, Agreed, and
2 Approved for Entry,
3 Waiving Notice:

W.I. FOREST PRODUCTS

4 Dated: Aug. 6, 1990

By: Dana A. Weststraver

U.S. ENVIRONMENTAL PROTECTION
AGENCY

8 Dated: Aug 6, 1990

By: Juliane R.B. Matthews

JULIANE R.B. MATTHEWS
Assistant Regional Counsel



RECEIVED

AUG 02 1990

PESTICIDES & TOXIC
SUBSTANCES BRANCH
EPA REGION 10

RECEIVED

JUL 30 1990

HEARINGS CLERK
EPA—REGION X

Reply To:
Attn Of: So-125

JUL 30 1990

Dana Westenhaver
W.I. Forest Products
4000 Kruse Way Place #2-355
Lake Oswego, Oregon 97035

Re: In the Matter of: W.I. Forest Products,
Toxic Substance Control Act Docket No. 1090-03-23-2615

Dear Mr. Westenhaver:

Enclosed is the Motion, Stipulation, and Order for Extension of Time to File the Answer in the above-entitled matter. The new deadline for filing the answer is August 14, 1990.

Thank you for your cooperation.

Sincerely,

Juliane R. B. Matthews
Juliane R. B. Matthews
Assistant Regional Counsel

Enclosure

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3 RECEIVED

4 JUL 30 1990

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6 HEARINGS CLERK
7 EPA—REGION X

8 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
9 BEFORE THE REGIONAL ADMINISTRATOR
10 Region 10
11 Seattle, Washington

12 IN THE MATTER OF:)

13 W.I. FOREST PRODUCTS,)

14 Respondent.)

Docket No. TSCA 1090-03-23-2615

MOTION, STIPULATION, AND ORDER
FOR EXTENSION OF TIME TO
FILE ANSWER

15
16 MOTION AND STIPULATION

17 The Parties in the above-entitled matter jointly request
18 and stipulate that the time for Respondent to file an answer be
19 extended in order to allow the Parties sufficient time to attempt
20 to resolve the matter.
21

22
23 Dated: 7/30/90

Dana Westphaler by JRM
FOR RESPONDENT pursuant to 7/30/90
conversion

24
25
26 Dated: 7/30/90

Juliane RB Matthews
FOR EPA

27
28 MOTION, STIPULATION, AND ORDER FOR EXTENSION OF TIME - PAGE 1

ORDER

In accordance with 40 C.F.R. §§ 22.07(b) and 22.16(c) and pursuant to the Parties' approval by the signature(s) affixed above, the time for Respondent to file an answer is extended to the close of business on the 14th day of August, 1990.

Dated: July 30, 1990

THOMAS P. DUNNE
ACTING REGIONAL ADMINISTRATOR

Maurice L. AT Tensi
By Direction
Hearing Clerk, EPA Region 10

Brannick



MAY 3 1990

Reply To:
Attn Of: So-125

MAY 31 1990

HEARINGS CLERK
EPA-REGION X

Dana Westenhaver
W.I. Forest Products
4000 Kruse Way Place #2-355
Lake Oswego, Oregon 97035

Re: In the Matter of: W.I. Forest Products,
Toxic Substance Control Act Docket No. 1090-03-23-2615

Dear Mr. Westenhaver:

Pursuant to our conversation May 30, 1990, enclosed is the Motion, Stipulation, and Order for Extension of Time to File the Answer in the above-entitled matter. The new deadline for filing the answer is July 3, 1990.

This should allow sufficient time for you to obtain the test results and for us to conclude our settlement discussions.

Thank you for your cooperation in reaching resolution in this matter.

Sincerely,

RECEIVED

JUN 05 1990

PESTICIDES & TOXIC
SUBSTANCES BRANCH
EPA REGION 10

Juliane R. B. Matthews
Juliane R. B. Matthews
Assistant Regional Counsel

Enclosure

MAY 31 1990

HEARINGS CLERK
EPA-REGION X

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE REGIONAL ADMINISTRATOR
Region 10
Seattle, Washington

IN THE MATTER OF:

W.I. FOREST PRODUCTS,

Respondent.

Docket No. TSCA 1090-03-23-2615

MOTION, STIPULATION, AND ORDER
FOR EXTENSION OF TIME TO
FILE ANSWER

MOTION AND STIPULATION

The Parties in the above-entitled matter jointly request and stipulate that the time for Respondent to file an answer be extended in order to allow the Parties sufficient time to attempt to resolve the matter.

Dated: 5/30/90

Dana Westenhaver by Jm
FOR RESPONDENT *pursuant to 5/30/90*
concessary

Dated: 5/30/90

Juliane PB Matthews
FOR EPA

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Dated: May 30, 1990

Muskuin L. A. W. / ansin

MOTION, STIPULATION, AND ORDER FOR EXTENSION OF TIME - PAGE 2

Barneck



JUL 16 1990

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Reply To:
Attn Of: So-125

RECEIVED

JUL 16 1990

JUL 19 1990

PESTICIDES & TOXIC
SUBSTANCE BRANCH

HEARINGS CLERK
EPA — REGION X

Dana Westenhaver
W.I. Forest Products
4000 Kruse Way Place #2-355
Lake Oswego, Oregon 97035

Re: In the Matter of: W.I. Forest Products,
Toxic Substance Control Act Docket No. 1090-03-23-2615

Dear Mr. Westenhaver:

Pursuant to our conversation July 12, 1990, enclosed is the Motion, Stipulation, and Order for Extension of Time to File the Answer in the above-entitled matter. The new deadline for filing the answer is July 31, 1990.

Thank you for your cooperation.

Sincerely,

Juliane R. B. Matthews

Juliane R. B. Matthews
Assistant Regional Counsel

Enclosure

RECEIVED

JUL 16 1990

HEARINGS CLERK
EPA — REGION X

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE REGIONAL ADMINISTRATOR
Region 10
Seattle, Washington

IN THE MATTER OF:

W.I. FOREST PRODUCTS,

Respondent.

Docket No. TSCA 1090-03-23-2615

MOTION, STIPULATION, AND ORDER
FOR EXTENSION OF TIME TO
FILE ANSWER

MOTION AND STIPULATION

The Parties in the above-entitled matter jointly request and stipulate that the time for Respondent to file an answer be extended in order to allow the Parties sufficient time to attempt to resolve the matter.

Dated: 7/16/90

Dana Westenhaver by Jm
FOR RESPONDENT pursuant to 7/12/90
conversation

Dated: 7/16/90

Juliane Matthews
FOR EPA

1 ORDER

2 In accordance with 40 C.F.R. §§ 22.07(b) and 22.16(c)
3 and pursuant to the Parties' approval by the signature(s) affixed
4 above, the time for Respondent to file an answer is extended to
5 the close of business on the 31st day of July, 1990.

6
7 Dated: July 16, 1990

THOMAS P. DUNNE
ACTING REGIONAL ADMINISTRATOR

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10 William L. Atkinson
11 By Direction
12 Hearing Clerk, EPA Region 10
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Brenneck



JUN 28 1990

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Reply To:
Attn Of: So-125

JUN 28 1990

Dana Westenhaver
W.I. Forest Products
4000 Kruse Way Place #2-355
Lake Oswego, Oregon 97035

HEARINGS
EPA — REGION 10

Re: In the Matter of: W.I. Forest Products,
Toxic Substance Control Act Docket No. 1090-03-23-2615

Dear Mr. Westenhaver:

Pursuant to our conversation June 28, 1990, enclosed is the Motion, Stipulation, and Order for Extension of Time to File the Answer in the above-entitled matter. The new deadline for filing the answer is July 17, 1990.

I will send you a proposed Consent Agreement and Final Order shortly.

Thank you for your cooperation.

Sincerely,

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JUL 05 1990

PESTICIDES & TOXIC
SUBSTANCES BRANCH
EPA REGION 10

Juliane R. B. Matthews

Juliane R. B. Matthews
Assistant Regional Counsel

Enclosure

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JUN 28 1990

STAMPING

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE REGIONAL ADMINISTRATOR
Region 10
Seattle, Washington

IN THE MATTER OF:

W.I. FOREST PRODUCTS,

Respondent.

Docket No. TSCA 1090-03-23-2615

MOTION, STIPULATION, AND ORDER
FOR EXTENSION OF TIME TO
FILE ANSWER

MOTION AND STIPULATION

The Parties in the above-entitled matter jointly request and stipulate that the time for Respondent to file an answer be extended in order to allow the Parties sufficient time to attempt to resolve the matter.

Dated: 6/28/90

Dana Westenhaver by JAB
FOR RESPONDENT
Pursuant to 6/28/90 conversation

Dated: 6/28/90

Juliane B. Matthews
FOR EPA

1 ORDER

2 In accordance with 40 C.F.R. §§ 22.07(b) and 22.16(c)
3 and pursuant to the Parties' approval by the signature(s) affixed
4 above, the time for Respondent to file an answer is extended to
5 the close of business on the 17th day of July, 1990.

6
7 Dated: June 28/1990

THOMAS P. DUNNE
ACTING REGIONAL ADMINISTRATOR

9
10 Monica L. McAnis

By Direction
Hearing Clerk, EPA Region 10

NATIONAL CHEM LAB PCB TEST REPORT

04/17/90

133
WASHINGTON WATER POWER COMPANY
P.O. BOX 3727
SPOKANE, WA 99220
Attn: CRAIG SOBERG

NATIONAL CHEM LAB
103 12TH S.W.
EPHRATA, WA 98823
GLENDA NELSON, Chemist

Lab Report #: E0041707 IO number: 900134

Below is a listing of the samples received on 04/17/90 together with the laboratory results on their respective PCB content. Please contact the lab at 509-734-5725 if you have any questions regarding these sample results.

UTILITY SERIAL NO.	COMPANY #	MISC.	AROCLO	PPM	NCL #
267053	RUSH	SPOKANE L	1260	5	OE004271

*Jan -
here's
the test result
good news!
Glen*



DAW Forest Products Company

Dana A. Westenhaver
General Counsel
Employee Relations

Executive Offices
4000 Kruse Way Place
Building 2, Suite 355
Lake Oswego, OR 97035
Phone: (503) 635-1465



DAW Forest Products Company

K.C. Hansen

S. 200 Huettner Road
Coeur d'Alene, ID 83814
(208) 765-4717 - Office

Glen

Lab Report #: E0041707

Page 1

Number of samples: 1



APR 30 1990

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MAY 03 1990
PESTICIDES & TOXIC
SUBSTANCES BRANCH
EPA REGION 10

RECEIVED

APR 20 1990

HEARINGS CLERK
EPA-REGION 10

Reply To:
Attn Of: So-125

Dana Westenhaver
W.I. Forest Products
4000 Kruse Way Place #2-355
521 Wall Street
Lake Oswego, Oregon 97035

Re: In the Matter of: W.I. Forest Products,
Toxic Substance Control Act Docket No. 1090-03-23-2615

Dear Mr. Westenhaver:

Pursuant to our conversation April 27, 1990, enclosed is the Motion, Stipulation, and Order for Extension of Time to File the Answer in the above-entitled matter. The new deadline for filing the answer is June 3, 1990.

Also, pursuant to your request enclosed is a summary of the PCB regulation.

Thank you for your cooperation.

Sincerely,

Julianne R. B. Matthews
Assistant Regional Counsel

Enclosure

RECEIVED

APR 30 1990

HEARINGS CLERK
EPA-REGION X

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE REGIONAL ADMINISTRATOR
Region 10
Seattle, Washington

IN THE MATTER OF:

W.I. FOREST PRODUCTS,

Respondent.

Docket No. TSCA 1090-03-23-2615

MOTION, STIPULATION, AND ORDER
FOR EXTENSION OF TIME TO
FILE ANSWER

MOTION AND STIPULATION

The Parties in the above-entitled matter jointly request and stipulate that the time for Respondent to file an answer be extended in order to allow the Parties sufficient time to attempt to resolve the matter.

Dated: 4/30/90

Dana Westenhaver by JTB
FOR RESPONDENT pursuant to 4/27/90
Consent

Dated: 4/30/90

Juliane RB Matthews
FOR EPA

MOTION, STIPULATION, AND ORDER FOR EXTENSION OF TIME - PAGE 1

ORDER

In accordance with 40 C.F.R. §§ 22.07(b) and 22.16(c) and pursuant to the Parties' approval by the signature(s) affixed above, the time for Respondent to file an answer is extended to the close of business on the 3rd day of June, 1990.

Dated:

April 30, 1990

THOMAS P. DUNNE
ACTING REGIONAL ADMINISTRATOR

Wm. L. Allan

By Direction
Hearing Clerk, EPA Region 10

W-I FOREST PRODUCTS, L.P.



Timber and Lands

P.O. Box 1119
XXXXXXXXXXXX S.200 HUETTER
Coeur d'Alene, ID 83814
(208) 765-4717

February 12, 1991

Juliane Matthews
United States Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Wa. 98101

RE: Docket Number 1090-03-23-2615

Dear Ms. Matthews:

Attached you will find a copy of the bill for disposal of a PCB transformer at our Cashmere, Washington facility. You will also find a copy of the check issued to GE. I trust this will fulfill your requirements.

If I can be of any further assistance please call me at (208)-765-4717.

Sincerely,

K.C. Hansen

cc: Dana Westenhaver

RECEIVED
FEB 14 1991

OFFICE OF REGIONAL COUNSEL
EPA - REGION X



W-I FOREST PRODUCTS, L.P.

4000 KRUSE WAY PLACE • BUILDING 2 • SUITE 355
LAKE OSWEGO, OREGON 97034
PHONE (503) 635-1465

102448

95-651
1232 709

FIRST NATIONAL BANK OF OREGON
SUBSIDIARY OF U.S. BANCORP

PAY

TO THE
ORDER
OF

GE INDUSTRY SALES & SERVICE
Corporate Pooled Service
Department #61232
El Monte, CA 91735

The sum of 7,849.80

DATE 8/6/90 AMOUNT

\$ 7,849.80

W-I FOREST PRODUCTS, L.P.

BY

(b) (6)

AG '90 10

1230 CMM

CREDIT MEMORANDUM
WITHIN NORTHERN REGION P.E.G.
WELLS FARGO BANK N.A.
EL MONTE, CA
AG '90 08 16 24 84-34 AEM 750 AU2750

(b) (6)

WELLS FARGO BANK N.A.
2440 FLAIR DR
EL MONTE, CA 91735
84-34 AEM 750 AU2750

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COPY



W-I FOREST PRODUCTS, L.P.

4000 KRUSE WAY PLACE • BUILDING 2 • SUITE 355
LAKE OSWEGO, OREGON 97034
PHONE (503) 635-1465

102448

98-551
1232 709

FIRST NATIONAL BANK OF OREGON
SUBSIDIARY OF U.S. BANCORP

now
PAY

The sum of 7,849.80

DATE 8/6/90 AMOUNT

\$ 7,849.80

TO THE
ORDER
OF

GE INDUSTRY SALES & SERVICE
Corporate Pooled Service
Department #61232
El Monte, CA 91735

W-I FOREST PRODUCTS, L.P.

VOID VOID NOT NEGOTIABLE

PLEASE DETACH BEFORE DEPOSITING

DATE	OUR INV. NO.	YOUR INV. NO.	CAR NO.	GROSS AMT.	ADV.	FREIGHT	COMM.	CASH DISC.	NET AMT.
------	-----------------	------------------	---------	------------	------	---------	-------	---------------	----------

8/6/90

Invoice #Y101-50068.

\$7,849.80

W-I FOREST PRODUCTS, L.P.
4000 KRUSE WAY PLACE • BUILDING 2 • SUITE 355
LAKE OSWEGO, OREGON 97034
PHONE (503) 635-1465

102448



GE Industry Sales and Services

DEPARTMENT #61232
EL MONTE, CALIFORNIA

NET CASH DUE 08/08/90 91735

K.C. HANSEN

22090

Y101-50068 072490 1

D.A.W FOREST PRODUCTS
W.I. FOREST PRODUCTS
S. 200 HUETTER ROAD
COENR D'ALENE

ID 83814

D.A.W FOREST PRODUCTS
W.I. FOREST PRODUCTS
S. 200 HUETTER ROAD
COENR D'ALENE

ID

072490

GE TRUCK

PREPAID

REMOVAL AND DISPOSAL OF (1) 1500 KVA
TRANSFORMER CONTAINING APPROX 490 GAL
PCB OIL AT <500 PPM
PER QUOTE 101-90-105

THANK YOU FOR THE OPPORTUNITY TO BE OF
SERVICE TO YOU. IF YOU HAVE ANY
QUESTIONS REGARDING THIS INVOICE, PLEASE
CALL: CUSTOMER SERVICE
(503) 221-5100

MATERIAL TOTAL

7476.00

LABOR TOTAL

.00

SUBTOTAL BEFORE TAX
5%

7476.00
373.80

TOTAL AMOUNT BILLED

7849.80

COPY

101-099-000-05
K.C. Hansen
Cashmere

HU 8/6

Bill sent
Chapman & Pev

ORIGINAL INVOICE

Sale of any service (including any goods) covered by this invoice is conditioned upon the terms contained in the original quotation or acknowledgement of order, if any, otherwise upon the terms contained herein, including those on the back of the ORIGINAL INVOICE. Any additional or different terms proposed by the customer are objected to and will not be binding upon the Company, unless specifically assented to in writing by the Company's authorized representative. Note that no implied warranty of merchantability or fitness for purpose applies and that any claim that the services described herein are a warranty or other obligation of the Company must be made in writing prior to, or at, the time you place your order. Seller certifies that all goods described herein were produced in compliance with all applicable provisions of the Fair Labor Standards Act, as amended.



07 1991

Reply to the
Attention of M/S AT-083

K.C. Hansen
W-I Forest Products, L.P.
Timber and Lands
S. 200 Huetter Road
Coeur d'Alene, Idaho 83814

Re: Toxic Substances Control Act (TSCA)
Docket Number 1090-03-23-2615

Dear Mr. Hansen:

This is a follow-up to your phone conversation with Elaine Barrick on December 13, 1990, regarding the disposal of PCB (polychlorinated biphenyl) waste pursuant to the above-referenced TSCA case.

Paragraphs Ten through Twelve of the Consent Agreement and Final Order dated August 7, 1990, require that you submit, within nine months of the entry of that Order, an affidavit and appropriate documentation to verify that your company has incurred actual disposal costs of at least \$7,476 for the early disposal of regulated (e.g., by 40 C.F.R. Part 761) PCB equipment. The documentation received with your letter of November 28, 1990, did not include the information regarding the cost incurred by W-I Forest Products required for us to remit and excuse the suspended and deferred portion of the penalty. Upon receipt of such an affidavit and documentation within the timeframe identified in the Order, the suspended and deferred payment portion (\$3,738.00) of the imposed penalty will be wholly remitted and excused and we will consider the case closed.

If you have any questions, I can be reached at (206) 553-1169.

Sincerely,

Juliane Matthews
Juliane Matthews
Assistant Regional Counsel

cc: Dana Westenhaver

W-I FOREST PRODUCTS, L.P.



Timber and Lands

~~PO BOX 200~~ BOX 200 HUETTE
Coeur d'Alene, ID 83814
(208) 765-4717

November 28, 1990

Juliane Matthews
U.S. Environmental Protection Agency Region 10
1200 Sixth Ave. So.-125
Seattle, Wa. 98101

Dear Juliane,

Enclosed are copies of the original manifest and the final disposal records for pcb items at our Long Lake location. (refer to docket No. 1090-03-23-2615). Please call if you have any questions.

Sincerely,

K.C. Hansen

K.C. Hansen

Enclosure

cc: Dana Westenhaver

12-17-90

*Called K.C. Hansen - told
him this does not satisfy
CAFO condition - this
material documents disposal
but does not prove expenditures
of #2476.*

RECEIVED
NOV 30 1990

OFFICE OF REGIONAL COUNSEL
EPA - REGION X

RECEIVED
DEC 07 1990

PESTICIDES & TOXIC
SUBSTANCES BRANCH
EPA REGION 10

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1
of

Information in the shaded areas is
not required by Federal law.

3. Generator's Name and Mailing Address

WE = FUEL PRODUCTS (Spokane Site)

4. Generator's Phone () 749-0712

5. Transporter 1 Company Name

GENERAL ELECTRIC COMPANY

7. Transporter 2 Company Name

9. Designated Facility Name and Site Address

GENERAL ELECTRIC COMPANY

10. US EPA ID Number

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. Hazardous Substance LIQUID NOS
DANGER: 9180 RD
(Polychlorinated Biphenyls)

b. Hazardous Substance LIQUID NOS
DANGER: 9180 RD
(Polychlorinated Biphenyls)

c. Hazardous Substance NOS
DANGER: 9180 RD
(Polychlorinated Biphenyls)

d. Hazardous Substance NOS
DANGER: 9180 RD
(Polychlorinated Biphenyls)

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Vol

1. Waste No.

45 CM

6070

X002

46 CH

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

Dike and contain spills. Avoid contact with skin.
Alternate TSDF: Return To Generator.

15. Special Handling Instructions and Additional Information

2 (3 LBS. - 2 CAP BROS) 12 HR EMERGENCY RESPONSE
ALL (800) 454-412 EXT 1
SEE GUIDE NO. 1 ATTACHED

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name
KE HANSEN

Signature
KE Hansen

Month Day Year
05 12 90

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name
William C. Kessler

Signature
William C. Kessler

Month Day Year
05 27 90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year



May 29, 1990

Mr. K.C. Hansen
DAW FOREST PRODUCTS
s 200 Hueltte Road
Courd'alene, ID 83814

SUBJECT: HAZARDOUS WASTE MANIFEST NO. 22056
GENERAL ELECTRIC TRACKING NO. 22056A

Dear Mr. Hansen:

Attached please find the original copy of the Hazardous Waste Manifest signed by our representative upon receipt of your material at our PCB Decommissioning Facility in Portland. Please keep this record to establish the proper disposal of your PCB material.

We will provide you with copies of the Manifest when this material is sent out for final disposition. These copies will be signed by the ultimate disposer and our cover letter will reference the above captioned G.E. TRACKING NUMBER so that you will have a record of the material from the time it left your premises until it is properly disposed.

Should you have any questions, please do not hesitate to call me at (503) 221-5098.

Sincerely,

Shirlee K Porter
Facility Supervisor
Portland Oregon

Attachment
SKP/jrk

22056A

Please print or type
(Form designed for use on a 12-pin typewriter)

Form Approved OMB No. 2060-0038 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address DAN FOREST PRODUCTS (Spokane Site) S 200 HUELTER RD, COEUR D'ALENE, ID 83814		49 CFR PART 761		22056		A. State Manifest Document Number
4. Generator's Phone (208) 765-4717		5. Transporter 1 Company Name GENERAL ELECTRIC COMPANY		6. US EPA ID Number ORD 980 833 537		B. State Generator's ID
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address GENERAL ELECTRIC COMPANY 2535 NW 28TH AVE. PORTLAND, OREGON 97210		C. State Transporter's ID
10. US EPA ID Number		ORD 980 833 537		D. Transporter's Phone 503-221-5098		E. State Transporter's ID
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol
a. X Hazardous Substance LIQUID NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)		15		670		K
b. X Hazardous Substance LIQUID NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)		16				K
c. X Hazardous Substance NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)						
d. X Hazardous Substance NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)						
J. Additional Descriptions for Materials Listed Above Dike and contain spills. Avoid contact with skin. Alternate TSDF: Return To Generator.		K. Handling Codes for Wastes Listed Above				
15. Special Handling Instructions and Additional Information A) CAPACITORS IN DRUM; PCB2 (3 loose - 2 CAP BULK) CALL (800) 635-8918 EXT. 66 B) XFM; PCB1 SEE "CONTINUATION SHEET" O/S 5-21-90						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name KE. HANSEN		Signature KE. Hansen		Month Day Year 10/5/22/90		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name William C. Messer		Signature William C. Messer		Month Day Year 10/5/22/90		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name GARY E. SCHWALZ						
Signature Gary E. Schwaltz		Month Day Year 10/5/24/90				

GENERAL ELECTRIC COMPANY
 PORTLAND DECOM FACILITY
 PCB LOG REPORT
 11/20/90
 PAGE NO. 1

Job Numbers: 22056A
 FSR Numbers: ALL
 Customer Numbers: ALL

ITEM NO.	TYPE	PPM	MAKE	KVA	T	GAL SERIAL NO.	WEIGHT LBS	DATE KGS D/S	VOLUME	SHIPPED	DISPOSAL FACILITY	LOCATION	MANIFEST #	DESTRUCT DATE
22056A	FSR NO:					W1 FOREST PR./SPOKANE								
									(200)765-4717		REC'D: 05/24/90	22056		
001	SOLID	>25K	CAP/IN056AW-01			0001	0	0 05/21/90		06/28/90	ROLLINS-L	DEERPARK	00260031	07/25/90
002	SOLID	>25K	CAP/IN056AW-01			0002	0	0 05/21/90		06/28/90	ROLLINS-L	DEERPARK	00260031	07/25/90
003	SOLID	>25K	CAP/IN056AW-01			0003	0	0 05/21/90		06/28/90	ROLLINS-L	DEERPARK	00260031	07/25/90
004	SOLID	>25K	CAPS/IN056AW-1.2			0004 CABINET	475	216 05/21/90		06/04/90	USPCI-GRA	CLIVE	90051	06/05/90
005	SOLID	>25K	CAPS/IN056AW-3			0005 CABINET	202	92 05/21/90		06/04/90	USPCI-GRA	CLIVE	90051	06/05/90
							677	300						

GENERAL ELECTRIC COMPANY
 PORTLAND DECOM FACILITY
 PCB LOG REPORT
 11/20/90
 PAGE NO. 1

Job Numbers: 22056W
 FSR Numbers: ALL
 Customer Numbers: ALL

ITEM NO.	TYPE	PPM	MAKE	KVA	T	GAL	SERIAL NO.	WEIGHT LBS	DATE KGS O/S	VOLUME	SHIPPED	DISPOSAL FACILITY	LOCATION	MANIFEST #	DESTRUCT DATE
22056W	FSR NO:		WI	FOREST	PR./SPOKANE			COVER	D'ALENE	(200)765-4717	REC'D: 05/24/90		22056		
001	CAP-D	>25K	25	CAPS	FROM		22056A-1,2,3,4	432	196	05/21/90		06/28/90	ROLLINS-L	DEERPARK 00260831	07/25/90
002	CAP-D	>25K	5	CAPS	FROM	056A-5	18FROM 056A-4	532	242	05/21/90		06/28/90	ROLLINS-L	DEERPARK 00260831	07/25/90
003	CAP-D	>25K	3	CAPS	FROM	056A-5	29FROM 056A-4	496	225	05/21/90		06/28/90	ROLLINS-L	DEERPARK 00260831	07/25/90
								1460	664						

22054 JBE 35 Y0Y

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address		ORD 980 833 537		A. State Manifest Document Number		
MULTIPLE GENERATORS/GENERAL ELECTRIC COMPANY 2535 NW 28TH, PORTLAND, OR 97210				B. State Generator's ID		
4. Generator's Phone (503-221-5098)				C. State Transporter's ID		
5. Transporter 1 Company Name		6. US EPA ID Number		D. Transporter's Phone		
DART TRUCKING COMPANY, INC		OHD 009 865 825		800-426-0895		
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		
				F. Transporter's Phone		
9. Designated Facility Name and Site Address		10. US EPA ID Number		G. State Facility's ID		
USPCI-GRASSY MOUNTAIN FACILITY 3MI-EAST, 7MINORTH OF EXIT 41, I-80 CLIVE, UTAH		UTD 991 301 748		H. Facility's Phone		
				801 534-0054		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <input checked="" type="checkbox"/> X Hazardous Substance SOLIDS NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)		25 CM		7511	K	
b. <input checked="" type="checkbox"/> X Hazardous Substance SOLIDS NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)		32 DM		9014	K	
c. <input checked="" type="checkbox"/> X Hazardous Substance NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)		Ø				
d. <input checked="" type="checkbox"/> X Hazardous Substance NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)		Ø				
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
Dike and contain spills. Avoid contact with skin. Alternate TSDF: Return To Generator. BL 37320						
15. Special Handling Instructions and Additional Information		24 HR EMERGENCY RESPONSE				
A) 21 XFRMS; 16GB89-423; 5GB89-424; 2-GB89-475; 2-GB-474		CALL (800) 635-8918 EXT. 66				
B) 32 DRUMS OF DEBRIS; GB89-422		SEE GUIDE NO. 31 - ATTACHED				
SEE CONTINUATION SHEET						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name		Signature		Month Day Year		
GARY E. SCHMALZ		Gary E. Schmalz		10/6/90		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
John Schaefer		John Schaefer		10/6/90		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month Day Year		
JOHN W. HAIGHT		John W. Haight		10/6/90		

ORIGINAL-RETURN TO GENERATOR

1A + 1A 1A-1A-UB

22054

USPCI - Grassy Mountain Facility
EPA ID # UTD991301748
3 Miles East 7 Miles North
of Knolls, UT Exit 41 on I-80

CERTIFICATE OF DISPOSAL

As required by 40 CFR 761.218 (a), we are providing this
Certificate of disposal to GENERAL ELECTRIC/MULTIPLE GENERATORS
to confirm that load # 10277

GB-89-0423 DRAINED PCB TRANSFORMERS
GB-89-0424 FLUSHED PCB TRANSFORMERS

shipped on manifest number ORD980833537-90051

was/were disposed in Cell Y, an EPA approved chemical waste
landfill on 06/05/90.

Under civil and criminal penalties of law for the making or
submission of false or fraudulent statements or representations
(18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the
information contained in or accompanying this document is true,
accurate, and complete. As to the identified section(s) of this
document for which I cannot personally verify truth and
accuracy, I certify as the company official having supervisory
responsibility for the persons who, acting under my direct
instructions, made the verification that this information is
true, accurate, and complete.

William K. Hall
General Manager

Cert. # 90-1891

22056

USPCI - Grassy Mountain Facility
EPA ID # UTD991301748
3 Miles East 7 Miles North
of Knolls, UT Exit 41 on I-80

CERTIFICATE OF DISPOSAL

As required by 40 CFR 761.218 (a), we are providing this
Certificate of disposal to GENERAL ELECTRIC/MULTIPLE GENERATORS
to confirm that load # 10277

GB-89-0475 DRAINED PCB CONTAINERS
GB-89-0474 DRAINED PCB CONTAINERS
GB-89-0422 PCB CONTAMINATED SOIL/DEBRIS/RAGS

shipped on manifest number ORD980833537-90051

was/were disposed in Cell X, an EPA approved chemical waste
landfill on 06/05/90.

Under civil and criminal penalties of law for the making or
submission of false or fraudulent statements or representations
(18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the
information contained in or accompanying this document is true,
accurate, and complete. As to the identified section(s) of this
document for which I cannot personally verify truth and
accuracy, I certify as the company official having supervisory
responsibility for the persons who, acting under my direct
instructions, made the verification that this information is
true, accurate, and complete.

William K. Hall
General Manager

Cert. # 90-1892



✓ BCL-200
98068

Please print or type (Form designed for use on elite (12 pitch) typewriter)

Form approved OMB No 2050 0039, expires 09-30 91

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No ORD 980 833 537		Manifest Doc 98068		2 Page 1 of 1		Information in the shaded areas is not required by Federal law		
3 Generator's Name and Mailing Address MULTIPLE GENERATORS/GENERAL ELECTRIC COMPANY 2535 NW 28TH AVE., PORTLAND, OR 97210						A State Manifest Document Number No 00268831				
4 Generator's Phone 503-221-5098						B State Generator's ID 99941				
5 Transporter 1 Company Name CUSTOM ENVIRONMENTAL TRAN			6 US EPA ID Number DED 980 918 858			C State Transporter's ID 40956				
7 Transporter 2 Company Name			8 US EPA ID Number			D Transporter's Phone 713 479-4801				
9 Designated Facility Name and Site Address ROLLINS ENVIRONMENTAL SERVICE INC. 2027 BATTLEGROUND ROAD DEER PARK, TEXAS 77536			10 US EPA ID Number TXD 055 141 378			E State Transporter's ID				
						F Transporter's Phone				
						G State Facility's ID 50039				
						H Facility's Phone 713-930-2300				
11A HM	11 US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)					12 Containers No	Type	13 Total Quantity	14 Unit Wt. Vol	15 Waste No
X	Hazardous Substance SOLIDS NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)					29176-48	002	DM	109 84	K 118270
X	Hazardous Substance LIQUIS NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)					26304-39	23	del	7961	del 113880
X	Hazardous Substance LIQUID NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)					26308-40	4	DM	7961	118378
X	Hazardous Substance LIQUID NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)					26311-40	12	del	7961	118378
X	Hazardous Substance NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)					26313-40	1	del	7961	118378
X	Hazardous Substance NOS ORM-E NA 9188 RQ (Polychlorinated Biphenyls)					26304-39	1	del	7961	118378
J. Additional Descriptions for Materials Listed Above Dike and contain spills. Avoid contact with skin. Alternate TSDF: Return To Generator.						K. Handling Codes for Wastes Listed Above a. TO7 C. TO7 b. TO7 D. TO7 TO6				
15 Special Handling Instructions and Additional Information A) 2 DRUMS OF DEBRIS B) 60 DRUMS OF LIQUID/CAPS C. Box of Caps 4 D. 1 cm of Caps SEE CONTINUATION SHEET						24 HR EMERGENCY RESPONSE CALL (800) 635-8918 EXT. 66 SEE GUIDE NO. 31 - ATTACHED				
16 I, the undersigned, hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.										
Printed/Typed Name GARY E. SCHMAZ						Signature Gary E. Schmaz			Month Day Year 06/28/90	
17 Transporter 1 Acknowledgement of Receipt of Materials						Signature James Paul Barker			Month Day Year 06/28/90	
Printed/Typed Name JAMES PAUL BARKER						Signature James Paul Barker			Month Day Year 06/28/90	
18 Transporter 2 Acknowledgement of Receipt of Materials						Signature			Month Day Year	
Printed/Typed Name						Signature			Month Day Year	
19 Discrepancy Indication Space Changes in 11, 12, 13, 14, 15, B, I per Shirlee Porter See attached sheet. Drawing per Cliff Watson. J. McClellan 7/1/90 J. Speller 7-3-90										
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. RESIDUAL										
Printed/Typed Name Karen Donly						Signature Karen Donly			Month Day Year 11/1/90	

P 10/16

ROLLINS

ENVIRONMENTAL SERVICES (DE) INC.

P.O. Box 609, Deer Park, TX 77536, 713/930-2300

October 15, 1990

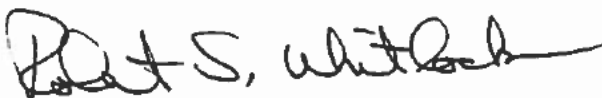
GENERAL ELECTRIC
2535 N.W. 28TH AVENUE
PORTLAND, OR 97210

ATTN: SHIRLEE PORTER

Dear Mr. Porter:

This is to certify the attached list of PCB material was incinerated at our Deer Park facility - Rollins Environmental Services (TX) Inc., P. O. Box 609, Deer Park, Texas 77536 (EPA ID# TXD055141378) in accordance with 40 CFR 761 as it pertains to incineration of PCB solids, liquids, and capacitors.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.



ROBERT S. WHITLOCK
OPERATIONS MANAGER

Attachment

Please call (713) 930-2317 if there are any questions concerning the information on this Certificate of Destruction.

22074	22042	22036
22050	22051	22041
22075	22045	
22056	22046	
	22052	

PROGRAM-ID: PTR1722
 RUN DATE : 10/13/90
 RUN TIME : 3:52 PM

ROLLINS ENVIRONMENTAL SERVICES (TX) INC
 CERTIFICATE OF DESTRUCTION AUTHORIZED
 FOR PCB MATERIAL

PAGE: 9

Stream Number	Bill of Lading	Invoice Pounds	Manifest Number	Received Date	Final Destroyed Date	Certificate of Destruction Name and Address
026304	118291	9,595	TX00268831	07/01/90	10/05/90	GENERAL ELECTRIC 2535 NW 28TH AVE PORTLAND Attn: SHIRLEE PORTER

Inventory Cntrl Nbr	Customer's Unique Serial Number	Type	CONTAINER Pounds	Contents	Suffix Code	Destroyed Date
001358400	22074012	BOX	856	CAPACITORS	39	10/05/90
001358401	22050026	55SD	256	CAPACITORS	39	10/25/90
001358402	2205023	55SD	148	CAPACITORS	39	10/25/90
001358403	22075001	55SD	504	CAPACITORS	39	10/25/90
001358404	220568001	55SD	250	CAPACITORS	39	10/25/90
001358405	22056W001	55SD	470	CAPACITORS	39	10/25/90
001358406	22056W002	55SD	542	CAPACITORS	39	10/25/90
001358407	22050025	55SD	280	CAPACITORS	39	10/25/90
001358408	22050024	55SD	176	CAPACITORS	39	10/25/90
001358409	22042001	55SD	218	CAPACITORS	39	10/25/90
001358410	22051004	55SD	368	CAPACITORS	39	10/25/90
001358411	22056W003	55SD	492	CAPACITORS	39	10/25/90
001358412	22051007	55SD	312	CAPACITORS	39	10/25/90
001358413	22074011	BOX	724	CAPACITORS	39	10/18/90
001358414	22045002	BOX	100	CAPACITORS	39	10/18/90
001358415	22074013	BOX	636	CAPACITORS	39	10/05/90
001358416	22046001	BOX	422	CAPACITORS	39	10/05/90
001358417	22052004	55SD	310	CAPACITORS	39	10/25/90
001358418	22051006	55SD	356	CAPACITORS	39	10/25/90
001358419	22052005	55SD	256	CAPACITORS	39	10/25/90
001358420	22052001	55SD	254	CAPACITORS	39	10/25/90
001358421	22051003	55SD	272	CAPACITORS	39	10/25/90
001358422	22036W005	55SD	132	CAPACITORS	39	10/25/90
001358423	22041006	55SD	276	CAPACITORS	39	10/25/90
001358424	22052002	55SD	180	CAPACITORS	39	10/25/90
001358425	22052003	55SD	100	CAPACITORS	39	10/25/90
001358426	22051005	55SD	392	CAPACITORS	39	10/25/90
001358427	22051002	55SD	312	CAPACITORS	39	10/25/90

9,594

RECEIVED *Barnick*

AUG 30 1990



W-I FOREST PRODUCTS, L.P. HEARINGS CLERK

4000 KRUSE WAY PLACE • BUILDING 2 • SUITE 355
LAKE OSWEGO, OREGON 97034
PHONE (503) 635-1465

EPA—REGION X

102471

96-651 709
1232

FIRST NATIONAL BANK OF OREGON
SUBSIDIARY OF U.S. BANCORP

The sum of 8,762 dol's 00 cts

PAY

DATE 8/27/90 AMOUNT

\$ 8,762.00

TO THE
ORDER
OF

UNITED STATES TREASURER

W-I FOREST PRODUCTS, L.P.

BY *Chris Archibald*

(b) (6)

PLEASE DETACH BEFORE DEPOSITING

DATE	OUR INV. NO.	YOUR INV. NO.	CAR NO.	GROSS AMT.	ADV.	FREIGHT	COMM.	CASH DISC.	NET AMT.
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8/27/90 CAFO Docket #1090-03-23-2615.

\$8,762.00

W-I FOREST PRODUCTS, L.P.
4000 KRUSE WAY PLACE • BUILDING 2 • SUITE 355
LAKE OSWEGO, OREGON 97034
PHONE (503) 635-1465

102471

RECEIVED
SEP 04 1990

PESTICIDES & TOXIC
SUBSTANCES BRANCH
EPA REGION 10

W-I FOREST PRODUCTS, L.P.



RECEIVED

AUG 30 1990

HEARINGS CLERK
EPA—REGION X

August 27, 1990

Executive Offices

4000 Kruse Way Place
Bldg. 2, Suite 355
Lake Oswego, OR 97035
(503) 635-1465 - Office
(503) 636-6995 - Fax

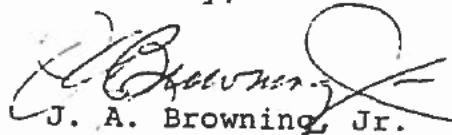
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 10
Region 10 Hearing Clerk
P.O. Box 360903M
Pittsburgh, Pennsylvania 15251

Re: In the matter of: W-I Forest Products, L.P., Toxic
Substance Control Act - Docket No. 1090-03-23-2615

Gentlemen:

Pursuant to the Consent Agreement and Final Order (CAFO) relating
to the captioned matter, enclosed is our check for \$8,762.00.

Sincerely,


J. A. Browning, Jr.
Vice President - Finance

JAB:lw

Enclosure

cc: Regional Hearing Clerk
Office of Regional Counsel
U.S. EPA, Region 10
1200 Sixth Avenue, SO-0125
Seattle, WA 98101

Dana Westenhaver
K.C. Hansen

VIOLATION ASSESSMENT - EPA REGION 10

Barbara Ross, EPS
NAME AND TITLE OF EVALUATOR

Mr 2-4-92

PROGRAM: TSCA (PCB)

FACILITY NAME AND ADDRESS

W-I Forest Products
P.O. Box 3344
Spokane, WA 99220

	<u>ACTION TAKEN</u>
<input checked="" type="checkbox"/>	NO VIOLATION/CLOSURE
<input type="checkbox"/>	NO VIOLATION/ADVISORY
<input type="checkbox"/>	NOTICE OF NONCOMPLIANCE
<input type="checkbox"/>	FED FAC: NOTICE OF SIGNIFICANT NONCOMPLIANCE
<input type="checkbox"/>	REF: ADM. CIVIL PENALTY
<input type="checkbox"/>	REF: FED COMPLAINT
<input type="checkbox"/>	OTHER

August 13, 1991
DATE OF INSPECTION

Peter Maule
NAME OF INSPECTOR

COMMENTS

COMPLIANCE HISTORY

On October 11, 1989, EPA conducted a PCB inspection at W-I Forest Products in Spokane, Washington. As a result of this inspection, a PCB Complaint was issued on April 6, 1990. The proposed penalty was \$17,000 for disposal, storage, and marking violations. A Consent Agreement and Final Order was signed on August 7, 1990.

(CONTINUED ON NEXT PAGE)

PAGE TWO - VIOLATION ASSESSMENT
FIRM: W-I Forest Products

COMPLIANCE HISTORY (CONTINUED)

A citizen's complaint was received by the Department of Ecology stating that there were stored transformers hidden at W-I Forest Products in the "White Building". On August 13, 1991, the EPA inspector went to the site, because of the citizen's complaint. The inspector found out that the "White Building" had been removed. The building had been vacant and was being accessed by trespassing neighborhood children. Prior to its removal, there were no transformers or anything else stored in the building, according to W-I Forest Products. The inspector limited his inspection to only viewing the prior site of the "White Building". He did not want to conduct "another complete TSCA inspection so soon after the prior one". He did not observe any electrical equipment.

ANNUAL DOCUMENT (OR ANNUAL DOCUMENT LOG) ASSESSMENT

The inspector did not get copies of any Annual Documents.

QUARTERLY (OR ANNUAL) INSPECTION/RECORD ASSESSMENT

The inspector did not get copies of any Quarterly Inspection Records.

NOTIFICATION AND MANIFESTING ASSESSMENT

The inspector did not get any information about notification and manifesting.

OTHER REGULATORY ASSESSMENT

Since a complete PCB inspection was not conducted, I recommend closure of this case with no further action.

Barbara Ross
CASE REVIEWER

2-5-92
DATE

9/28/2003
CONCUR

2/5/92
DATE

DO NOT CONCUR

DATE _____

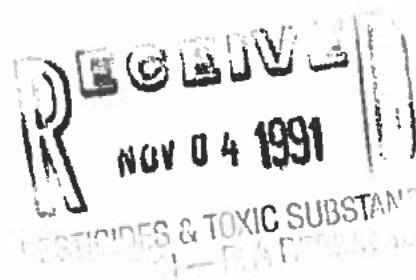
**TSCA PCB INSPECTION REPORT
W-I FOREST PRODUCTS, L.P., SPOKANE WA.
AUGUST 13, 1991**

MAILING ADDRESS:

Tom S. Landwehr, Plant Manager
W-I Forest Products, L.P.
P.O. Box 3344
Spokane, WA 99220

SITE ADDRESS:

E2306 Mallon
Spokane, WA



INVESTIGATOR:

Peter Maule, State TSCA/PCB Officer, Toxics Clean-Up Program,
Washington Department of Ecology (Ecology)

Lynn Maser, Solid and Hazardous Waste Inspector,
Ecology, Eastern Regional Office (ERO)

PREVIOUS TSCA ENFORCEMENT ACTIVITY/BACKGROUND:

W-I Forest Products (WIFP) was targeted by Ecology because of a complaint received by Ecology's ERO. The complainant alleged that there were stored transformers, hidden on site, that were not reported in a recent PCB regulatory inspection. This present inspection was in partial fulfillment of EPA-X's allowed quota of unspecified Ecology targets.

After committing to do this repeat inspection, EPA-X was called from Ecology's ERO, and the following was learned. EPA-X's Mike Hoyle did a TSCA inspection at WIFP on October 11, 1989. The consent agreement letter for that inspection reportedly was signed August 7, 1990. EPA-X's file reportedly includes manifests dated November 28, 1990. The more recent complaint described equipment and a site that were also both specified in Mike Hoyle's report. It is presumed they are the same. It is also presumed that the complainant did not differentiate between Ecology and EPA.

COMMENCEMENT/INTRODUCTION:

After a 15 minute drive through, we entered the WIFP'S office at 1340 hrs, August 13, 1991. I showed my credentials to Mr. Tom S. Landwehr, Plant Manager. We attended to the usual inspection forms in a routine manner.

FACILITY'S EXPLANATION:

He gave us the following explanation. He has been the Manager of this facility for six months. Mr. Ben Shaw has been WIFP's electrician for three months. They knew nothing about the prior TSCA PCB inspection. The extant employee who should be know about the prior TSCA inspection and about any alleged, imputed equipment, is Mr. K.C. Hansen. Mr. Hansen is WIFP's Fire and Safety Officer, and is based out of WIFP's Coeur d'Alene, Idaho facility; but he was on leave at the time of this inspection. His telephone number is 208-765-4717.

One of the first things Mr. Landwehr did as the new manager was remove the "white building in the Northwest corner of the facility" (described both in the complaint and in Mike Hoyle's report). The building had been vacant and was being accessed by trespassing neighborhood children. There were no transformers or anything else stored in the building. The building's removal was prompted by a tour with the city attorney, who pointed out WIFP's potential liability from fire/safety complaints received from the contiguous residential neighborhood.

RECORD REVIEW:

The only document reviewed was an aerial photo of WIFP that was on Mr. Landwehr's office wall, which showed the location of the imputed "white Building". See attached photos.

INSPECTION TOUR:

In our drive-through prior to entering the office, we could not find the imputed building. In the office I photographed the Aerial photo, described above. After leaving the office we drove to, and photographed, the prior site of the impute building. We saw nothing of further concern at this time.

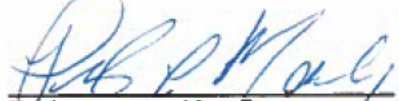
CLOSING REMARKS:

I said I did not want to beleaguer WIFP with another complete TSCA inspection so soon after the prior one. I explained that we were responding to the specific complaint, focusing only on that alleged equipment at the site of the "White Building". I said I may call Mr. Hansen for further information. I explained EPA-X's usual follow-up to a TSCA/PCB inspection. I thanked Mr. Landwehr for his assistance. We left his office at 1420 hr, and left the facility at 1430 hrs.

W-I Forest Products
page 3

WRITTEN:

0135 hrs, August 14, 1991; Republic, Washington.


Peter A. Maule
WA. TSCA/PCB Officer

ATTACHMENTS:

2 photos
Notice of Inspection
Inspection Confidentiality Notice

PM:pm
(yellow WIFOREST.REP)

Photo 1



Airphoto showing prior existence and location of imputed "white building", at lower left.

Photo 2



Present site of prior "white building", between fire hydrant and lumber stacks.



ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Form Approved
OMB No. 2070-0007
Expires 3-31-88

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE 8/13/91	INSPECTOR NO. WA-003	DAILY SEQ. NO. C10	13:50	W-I Forest Products L.P.
4. INSPECTOR ADDRESS WA. Dept of Ecology NWRO 3190 - 460th Ave. SE. Bellevue, WA 98008-5452			5. FIRM ADDRESS P.O. Box 3344 Spokane, WA 99220 E2306 Mellon Spokane	

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR SIGNATURE 		RECIPIENT SIGNATURE 	
NAME Peter A. Maule		NAME Tom S. Landwehr	
TITLE TSCA/PCB Officer	DATE SIGNED 8/13/91	TITLE Plant Manager	DATE SIGNED 8-13-91



ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 8/13/91	INSPECTOR NO. WA-003	DAILY SES. NO. (1)	W-I Forest Products, L.P.
3. INSPECTOR NAME Peter A. Maule			4. FIRM ADDRESS P.O. Box 33451 Spokane, WA 99220
5. INSPECTOR ADDRESS WA. Dept of Ecology - INWRC 3190 - 160th Ave SE. Bellevue, WA 98008-5452			6. CHIEF EXECUTIVE OFFICER NAME Tom S. Landwehr
			7. TITLE Plant Manager

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:			If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.
I have received and read the notice			
SIGNATURE 		NAME	
NAME Tom S. Landwehr		TITLE	
TITLE Plant Manager	DATE SIGNED 8-13-91	ADDRESS	



Barano



Change

Delete

FINDS Input Form

Requested by: FTTS - YS

Date: 9/25/91

D&B: _____

EPA ID NUMBER: _____

Facility Name: Swanson Superior Forest Products

Street 1: _____

Street 2: _____

City: Noti

State: OR

Zip Code: _____

County Code: 039/LANE

Congressional District: _____

Latitude: _____

Lat-Long Source: _____

Longitude: _____

Lat-Long Accuracy: _____

SIC codes: _____

Indian Land: N

(Y,N)

Federal Facility: N

(Y,N)

Comments: _____

RCRIS(OSW) : _____

PCS(OWER) : _____

CDS(OAR) : _____

FTTS(OTS) 09199117091

CERCLIS(DOCKET) : _____

DOCKET(OECM) : _____

Loaded by: _____

Date: _____

Verified by: _____

Date: _____

CC: _____

CC: _____

CC: _____

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. John Artechevarria, Plant Mgr W. I. Forest Products Long Lake Division P.O. Box 3344 Spokane, WA 99220	4. Article Number P-539 662 366 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Address X	8. Addressee's Address (ONLY if requested and fee paid) SAME AS 43
6. Signature — Agent X <i>Elvira Henderson</i> 7. Date of Delivery APR 1 1980	



Reply To
Attn Of: SO-125

APR 19 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

John Artechevarria, Plant Manager
W.I. Forest Products
Long Lake Division
P.O. Box 3344
Spokane, Washington 99220

Re: Toxic Substances Control Act
Docket No. 1090-03-23-2615

Dear Mr. Artechevarria:

Enclosed you will find a Complaint and Notice of Legal Proceedings; Notice of EPA Complaint; and Notice of Opportunity for Hearing and for Settlement Meeting. Copies of the regulations and Rules of Practice applicable to these proceedings are also enclosed. You are hereby advised to read these documents carefully and communicate your answer within the time limit specified.

The Complaint alleges that your company, W.I. Forest Products, violated the disposal, marking, and storage provisions of the PCB Regulations issued pursuant to the Toxic Substances Control Act. You are allowed twenty (20) days to formally answer the Complaint unless you request and receive a written extension of time. However, we are available to informally discuss the alleged violations and proposed penalties. Such discussions may result in settlement which would make the filing of a formal answer unnecessary.

Juliane Matthews, Assistant Regional Counsel, is knowledgeable about this subject and can be reached at (206) 442-1169.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth D. Feigner".

Kenneth D. Feigner, Chief
Pesticides and Toxic Substances Branch

Enclosures

cc: Bill Danson, EPA Headquarters

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:	}	DOCKET NO. 1090-03-23-2615
	}	
W.I. FOREST PRODUCTS,	}	NOTICE OF LEGAL PROCEEDINGS;
	}	NOTICE OF EPA COMPLAINT; AND
	}	NOTICE OF OPPORTUNITY FOR
Respondent.	}	HEARING AND FOR SETTLEMENT
	}	MEETING

THE REGIONAL ADMINISTRATOR, EPA REGION 10, GIVES NOTICE TO THE FOLLOWING RESPONDENT:

W.I. Forest Products

P.O. Box 3344

Spokane, Washington 99220

YOU ARE HEREBY GIVEN NOTICE AS FOLLOWS:

1. Administrative proceedings have been commenced against you by the U.S. Environmental Protection Agency ("EPA").
2. You are hereby NOTIFIED of, and served with, the ATTACHED TRUE COPY of a COMPLAINT filed in these proceedings. It explains EPA's claims for civil penalties proposed to be adjudged against you.
3. The signed original of the attached COMPLAINT is filed with the EPA Regional Hearing Clerk, 1200 Sixth Avenue, SO-125, Seattle, Washington, 98101, Phone No. (206) 442-1078.
4. The ATTACHED COMPLAINT is a claim by EPA for civil penalties to be assessed against you. Adjudicative proceedings to that end are controlled by the "Consolidated Rules of Practice" appearing in Title 40, Code of Federal Regulations (C.F.R.), Part 22 (copy attached to the COMPLAINT).
5. You have a RIGHT TO A HEARING BEFORE AN ADMINISTRATIVE LAW JUDGE:
 - A. To contest any material allegation of the attached penalty COMPLAINT which you genuinely deny; and/or
 - B. To contest the amount and appropriateness of the civil penalties proposed in the COMPLAINT.

However, TO OBTAIN A HEARING YOU MUST FILE A WRITTEN RESPONSE to the COMPLAINT called an "Answer."

6. YOU HAVE ONLY TWENTY (20) CALENDAR DAYS (if you choose to respond) from the day you receive this Notice within which to file a WRITTEN RESPONSE to the attached COMPLAINT. Such a written response or "Answer" must be filed by having it DELIVERED ON TIME to the EPA Hearing Clerk (address in paragraph 3). Copies of all papers filed by you must be delivered at the same time (by mail or otherwise) to the EPA attorney whose name appears below in paragraph 10.

7. ANY SUCH WRITTEN RESPONSE YOU FILE TO THE COMPLAINT MUST:

A. Request a hearing on the COMPLAINT (or your right to request a hearing on the COMPLAINT is deemed waived); and

B. Contain clear and direct admissions, denials, and/or explanations with respect to each of the allegations of the COMPLAINT; and

C. Contain a definite statement of any facts which you contend constitute grounds for defense against the penalty liability stated in the COMPLAINT; and

D. Contain a concise statement of all material facts relating to allegations in the COMPLAINT which you intend to place in issue at a hearing.

8. IF YOU FILE A LATE WRITTEN RESPONSE, OR IF YOU DO NOT FILE ANY WRITTEN RESPONSE, YOU ARE SUBJECT TO THE ENTRY OF AN ORDER OF DEFAULT on the COMPLAINT. After an order of default, penalties can be adjudged and imposed on you without any further notice to you.

9. AN INFORMAL SETTLEMENT MEETING can be held at your request. You may discuss there:

A. Whether or not the violations alleged truly occurred; and/or

B. The amount and appropriateness of any civil penalty considering: the size of your business, the gravity of any such violations, the effect of civil penalties on your ability to continue in business, and any other appropriate factors.

Such a meeting might resolve matters by a settlement which would make a hearing unnecessary.

10. In order to arrange an informal settlement meeting you must contact Julianne Matthews, Assistant Regional Counsel, at (206) 442-1169, 1200 Sixth Avenue, SO-125, Seattle, Washington 98101, not later than twenty (20) calendar days from receipt hereof.

11. PLEASE TAKE NOTICE that an EXTENSION OF TIME to make and file your written response may be negotiated with the EPA attorney named above. If an agreement is reached to extend time, a written stipulation and an agreed order will be entered in accordance with 40 C.F.R. § 22.16(c).

ISSUED AT SEATTLE this 6th day of April, 1990.


KENNETH D. FEIGNER, Chief
Pesticides and Toxic Substances Branch

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7 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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9 In the Matter of:

DOCKET NO. 1090-03-23-2615

10
11 W.I. FOREST PRODUCTS,

COMPLAINT

12
13 Respondent.
14

15 I.

16 JURISDICTION

17
18 1. This is an administrative action instituted pursuant to
19 Section 16(a) of the Toxic Substances Control Act (TSCA), 15 U.S.C.
20 § 2615(a), for the assessment of a civil penalty. The Complainant is
21 Region 10, United States Environmental Protection Agency (EPA). Complainant
22 has reason to believe that the above-named Respondent has violated federal
23 regulations addressing the use and/or disposal of polychlorinated biphenyls
24 (PCBs) (40 C.F.R. Part 761 promulgated under Section 6 of TSCA), and thereby
25 has violated Section 15 of TSCA, 15 U.S.C. § 2614.
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II.

FINDINGS AND VIOLATIONS

2. On October 11, 1989, an EPA inspection was performed at W.I. Forest Products. The purpose of the inspection was to determine compliance with TSCA, 15 U.S.C. § 2601 et seq., and specifically the PCB regulations promulgated at 40 C.F.R. Part 761. The inspection disclosed the following violations:

3. REGULATION - DISPOSAL: 40 C.F.R. § 761.60(d) states that spills, leaks, and other uncontrolled discharges of PCBs at concentrations of 50 ppm or greater constitute the disposal of PCBs. PCBs must be stored and disposed of in accordance with 40 C.F.R. § 761.60(a). Disposal of PCBs in any other manner constitutes the improper disposal of PCBs.

4. REGULATION - DEFINITIONS: 40 C.F.R. § 761.3 defines "PCB-Contaminated Electrical Equipment" as any electrical equipment, including transformers, that contain 50 ppm or greater PCB, but less than 500 ppm PCB. Oil-filled electrical equipment other than circuit breakers, reclosers, and cable whose PCB concentration is unknown must be assumed to be PCB-Contaminated Electrical Equipment.

1 5. **VIOLATION ONE:** An untested, oil-filled, transformer
2 mounted on a pole at the corner of Mallon and Altamont was leaking at the
3 time of the inspection. In the absence of information on the PCB content,
4 the transformer is considered regulated and is assumed to be, at a minimum,
5 PCB-Contaminated Electrical Equipment. The leaking from the transformer
6 constituted the improper disposal of PCBs.

7
8 6. **REGULATION - STORAGE:** 40 C.F.R. § 761.65(b) requires
9 that any facility used for the storage of PCBs and PCB Items designated for
10 disposal meet the following criteria:

- 11 1) Adequate roof and walls to prevent rain water from reaching
12 the stored PCBs and PCB Items;
- 13 2) An adequate floor which has continuous curbing with a minimum
14 six inch high curb. The floor and curbing must provide a
15 containment volume equal to at least two times the internal
16 volume of the largest PCB Article or PCB Container stored
17 therein or 25 percent of the total internal volume of all PCB
18 Containers stored therein, whichever is greater;
- 19 3) No drain valves, floor drains, expansion joints, sewer lines,
20 or other openings that would permit liquids to flow from the
21 curbed area;
- 22 4) Floors and curbing constructed of continuous smooth and
23 impervious materials, such as Portland cement concrete or
24 steel, to prevent or minimize penetration of PCBs; and
25 5) Not located at a site that is below the 100-year flood water
26 elevation.

1 7. REGULATION - STORAGE: 40 C.F.R. § 761.65(c)(8)
2 requires that PCB Articles and Containers be dated on the article or
3 container when they are placed in storage.
4

5 8. REGULATION - MARKING: 40 C.F.R. § 761.40(a)(1)
6 requires that each PCB Container be marked in accordance with § 761.45(a)
7 after July 1, 1978.
8

9 9. At the time of the inspection, the inspector observed an
10 unused large Pyranol General Electric 15 KVR 460 volt Capacitor (serial
11 number M115251) installed next to a large fan in an unused warehouse south of
12 Mallon Avenue. This capacitor is defined in the PCB Regulations as a large,
13 low-voltage PCB Capacitor.
14

15 10. VIOLATION TWO: The PCB capacitor identified in
16 Paragraph 9 was not stored in an area that complied with the requirements for
17 a PCB storage for disposal area as set forth at § 761.65(b).
18

19 11. VIOLATION THREE: The PCB capacitor identified in
20 Paragraph 9 was not properly dated in accordance with § 761.65(c)(8).
21

22 12. VIOLATION FOUR: The PCB capacitor identified in
23 Paragraph 9 was not marked with a PCB label as required by § 761.40(a)(5).
24
25
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27

1 13. VIOLATION FIVE: The PCB capacitor identified in
2 Paragraph 9 was stored in an area that was not marked with a PCB label in
3 accordance with § 761.40(a)(10).
4

5 14. REQUIREMENT - ASSUMPTIONS: 44 Federal Register 31522
6 (May 31, 1979) states that any large capacitor that cannot be shown to be
7 PCB-free by examining label or nameplate information, must be assumed to be a
8 PCB Capacitor.
9

10 15. Also located in the unused warehouse south of Mallon Avenue
11 was an unused Cornell Dubilser Electric Corporation 120 KVR 460 volt
12 capacitor (serial number 1414366). This capacitor did not have nameplate or
13 label information showing it to be PCB-free. Therefore, it must be assumed
14 to be a PCB Capacitor.
15

16 16. VIOLATION SIX: The PCB capacitor identified in
17 Paragraph 15 was not stored in an area that complied with the requirements
18 for a PCB storage for disposal area as set forth at § 761.65(b).
19

20 17. VIOLATION SEVEN: The PCB capacitor identified in
21 Paragraph 15 was not properly dated in accordance with § 761.65(c)(8).
22

23 18. VIOLATION EIGHT: The PCB capacitor identified in
24 Paragraph 15 was not marked with a PCB label as required by § 761.40(a)(5).
25
26
27

1 19. VIOLATION NINE: The PCB capacitor identified in
2 Paragraph 15 was stored in an area that was not marked with a PCB label in
3 accordance with § 761.40(a)(10).
4

5 20. In the northwest storage shed on the west end of the
6 maintenance shop, the inspector noted a Pyranol General Electric 20n KVAR
7 capacitor bank (serial number M93979) stored sitting on the ground among
8 piles of discarded machine parts. The capacitors mounted on the capacitor
9 bank are considered to be large PCB Capacitors removed from service and
10 stored for disposal.
11

12 21. VIOLATION TEN: The PCB capacitors identified in
13 Paragraph 20 were not stored in an area that complied with the requirements
14 for a PCB storage for disposal area as set forth at § 761.65(b).
15

16 22. VIOLATION ELEVEN: The PCB capacitors identified in
17 Paragraph 20 were not properly dated in accordance with § 761.65(c)(8).
18

19 23. VIOLATION TWELVE: The PCB capacitors identified in
20 Paragraph 20 were not marked with a PCB label as required by § 761.40(a)(5).
21

22 24. VIOLATION THIRTEEN: The PCB capacitors identified in
23 Paragraph 20 were stored in an area that was not marked with a PCB label in
24 accordance with § 761.40(a)(10).
25
26
27

25. The inspector also noted in the northwest storage shed an oil-filled General Electric 10 KVA transformer (serial number 2839715). The transformer had been removed from service and stored on a pallet for disposal.

26. **VIOLATION FOURTEEN:** The transformer identified in Paragraph 25, which must be assumed to be PCB-Contaminated Electrical Equipment, was not stored in an area that complied with the requirements for a PCB storage for disposal area as set forth at § 761.65(b).

27. **VIOLATION FIFTEEN:** The transformer identified in Paragraph 25, which must be assumed to be PCB-Contaminated Electrical Equipment, was not properly dated in accordance with § 761.65(c)(8).

28. **VIOLATION SIXTEEN:** The transformer identified in Paragraph 25, which must be assumed to be PCB-Contaminated Electrical Equipment, was leaking at the time of the inspection.

III.

PROPOSED CIVIL PENALTY

29. Section 16 of TSCA, 15 U.S.C. § 2615, and the regulations promulgated thereunder, 40 C.F.R. Part 761, authorize a civil penalty of up to \$25,000.00 per day for each violation of TSCA. Based upon the violations cited in this Complaint, the nature, circumstances, extent, and gravity of the violations alleged, Respondent's ability to pay, effect on the

1 Respondent's ability to continue to do business, Respondent's lack of prior
2 such violations, the degree of Respondent's culpability, and other such
3 matters as justice may require, the Complainant proposes that Respondent be
4 assessed the following penalty calculated in accordance with the Guidelines
5 for Assessment of Civil Penalties Under Section 16 of TSCA; PCB Penalty
6 Policy ("Penalty Policy"). A copy of the Penalty Policy accompanies this
7 Complaint.
8

9 30. The nature, circumstances, and gravity of Respondent's failure
10 to respond to leaking assumed-PCB-contaminated transformers, as cited in
11 Violations One and Sixteen, are represented by Level One on the matrix in the
12 Penalty Policy. The nature, circumstances, and gravity of Respondent's
13 failure to properly store PCB items stored for disposal, as cited in
14 Violations Two, Six, Ten, and Fourteen, are represented by Level Three on the
15 matrix. The nature, circumstances, and gravity of Respondent's failure to
16 properly date PCB items stored for disposal, as cited in Violations Three,
17 Seven, Eleven, and Fifteen, are represented by Level Five on the matrix. The
18 nature, circumstances, and gravity of Respondent's failure to properly label
19 PCB items and PCB storage for disposal areas, as cited in Violations Four,
20 Five, Eight, Nine, Twelve, and Thirteen, are represented by Level Three on
21 the matrix. The extent of these violations is represented by "minor" on the
22 matrix.
23
24
25
26
27
28

31. The proposed penalty reflects a presumption of Respondent's ability to pay the penalty and to continue in business. Respondent may submit appropriate documentation to rebut that presumption during settlement negotiations. Taking into account all the above factors, the penalty for Respondent W.I. Forest Products, as prescribed by the matrix, is \$17,000, calculated as set forth below. Based on the lack of prior such violations by Respondent, on the degree of culpability of Respondent, and on other matters as justice may require, no further adjustment of the penalty is indicated at this time. If appropriate, further penalty adjustments may be made during settlement negotiations.

<u>Regulation</u>	<u>Requirement</u>	<u>Penalty Amount</u>
1. 40 C.F.R. §§ 761.60 & 761.3	Disposal & Definitions	\$5,000
2. 40 C.F.R. § 761.65(b)	Storage for Disposal (SFD)	\$1,000*
3. 40 C.F.R. § 761.65(c)(8)	Storage (Dating)	\$*
4. 40 C.F.R. § 761.40(a)(5)	Marking (PCB item)	\$1,000*
5. 40 C.F.R. § 761.40(a)(10)	Marking (SFD area)	\$*
6. 40 C.F.R. § 761.65(b)	Storage (SFD area)	\$1,000*
7. 40 C.F.R. § 761.65(c)(8)	Storage (Dating)	\$*
8. 40 C.F.R. § 761.40(a)(5)	Marking (PCB item)	\$1,000*
9. 40 C.F.R. § 761.40(a)(10)	Marking (SFD area)	\$*
10. 40 C.F.R. § 761.65(b)	Storage (SFD area)	\$1,000*
11. 40 C.F.R. § 761.65(c)(8)	Storage (Dating)	\$*
12. 40 C.F.R. § 761.40(a)(5)	Marking (PCB item)	\$1,000*

1 admit, deny, or explain each of the factual allegations contained in this
2 Complaint with regard to which Respondent has any knowledge. Where
3 Respondent has no knowledge of a particular fact and so states, the
4 allegation is deemed denied. Failure to deny any material factual
5 allegation constitutes an admission of the allegation. The Answer shall
6 also state: (1) the circumstances or arguments which are alleged to
7 constitute the grounds of defense; (2) the facts which Respondent intends to
8 place at issue; and, (3) whether a hearing is requested. A hearing is
9 deemed requested should Respondent contest any material fact upon which the
10 Complaint is based or raise any affirmative defense, or contend that the
11 amount of the penalty proposed in the Complaint is inappropriate, or claim
12 that Respondent is entitled to judgment as a matter of law. The Answer must
13 be sent to:

14 Regional Hearing Clerk, Region 10
15 Environmental Protection Agency
16 1200 Sixth Avenue, SO-125
Seattle, Washington 98101

17 34. A copy of the Answer and all other documents which Respondent
18 shall file in this action must be furnished to Julianne Matthews, Assistant
19 Regional Counsel, the attorney assigned to represent EPA in this matter, at:

20
21
22 Office of Regional Counsel (SO-125)
23 U.S. Environmental Protection Agency, Region 10
24 1200 Sixth Avenue
25 Seattle, Washington 98101
26
27

V.

INFORMAL SETTLEMENT CONFERENCE

35. Whether or not a hearing is requested, Respondent may contact the above-named attorney to arrange for an informal settlement conference to discuss the facts of this case, the amount of the proposed penalty, or the possibility of settlement. An informal settlement conference does not, however, affect Respondent's obligation to file a timely written Answer to the Complaint.

36. EPA has the authority to modify the amount of the proposed penalty, where appropriate, to reflect any settlement reached with Respondent in an informal conference. The terms of such an agreement would be embodied in a Consent Agreement and Final Order. A Consent Agreement and Final Order entered into by and between EPA and Respondent would be binding as to all terms and conditions specified therein upon signature by both parties and by the EPA Administrative Law Judge, the Chief Judicial Officer, or the EPA Regional Administrator.

37. Respondent is advised that, after the Complaint is issued, the Consolidated Rules of Practice prohibit any ex parte (unilateral) discussion of the merits of any action with the EPA Regional Administrator, Chief Judicial Officer, Administrative Law Judge, or any person likely to advise these officials in the decision of this case.

VI.

PAYMENT OF PENALTY

38. Instead of requesting an informal settlement conference or filing an Answer requesting a hearing, Respondent may choose to pay the proposed penalty. In order to do this, Respondent must first establish contact with the EPA attorney named in Paragraph 33 of this Complaint to arrange for the preparation of a Consent Agreement and Final Order. After the Consent Agreement and Final Order has been signed by both parties and by the Regional Administrator, Respondent's payment must be made by sending a cashier's check or certified check, payable to the Treasurer, United States of America, in the amount of the penalty assessed in this Complaint to the address identified below:

Environmental Protection Agency, Region 10
(Regional Hearing Clerk)
P.O. Box 360903M
Pittsburgh, Pennsylvania 15251

with a copy of such check (and the transmittal letter, if any) sent to:

Regional Hearing Clerk
Office of Regional Counsel
Environmental Protection Agency
1200 Sixth Avenue, SO-125
Seattle, Washington 98101

ISSUED AT SEATTLE this 6th day of April, 1990.



KENNETH D. FEIGNER, Chief
Pesticides and Toxic Substances Branch

1
2
3 CERTIFICATE OF SERVICE
4

5
6 I hereby certify that the original of the foregoing Complaint and Notice
7 of Legal Proceedings; Notice of EPA Complaint; and Notice of Opportunity for
8 Hearing and for Settlement Meeting, Docket Number 1090-03-23-2615, have been
9 filed with the Region 10 Hearing Clerk, and that true and correct copies (with
10 accompanying copies of the Consolidated Rules of Practice and the Guidelines
11 for Assessment of Civil Penalties Under Section 16 of the Toxic Substances
12 Control Act; PCB Penalty Policy) were sent by Certified Mail, Return Receipt
13 Requested, to:
14

15
16
17 Mr. John Artechevarria, Plant Manager
18 W.I. Forest Products
19 Long Lake Division
20 P.O. Box 3344
21 Spokane, Washington 99220
22

23 April 10, 1990
24 DATE

25 
26 Romulo V. Corsilles
27 NAME

28 Acting Secretary, PTSB
TITLE

VIOLATION ASSESSMENT

~~Elaine Baruch~~ Elaine Baruch

1-25-90

(Name & title of Evaluator)

TSCA	X
FIFRA	

WI Forest Products
P.O. Box 3344
Spokane, WA. 99220

ACTION TAKEN

	No Action Indicated
	Notice Noncompliance
X	Refer for Ad. Civil Penalty
	Refer for Criminal Penalty
	Refer to State

10-11-89

Date of Inspection

Michael Hoyles

Name of Inspector

Comments:

Inspector noted several leaking transformers on-site which belong to Washington Water Power; these are addressed separately. There was also on-site another leaking transformer not identified as belonging to WA Water Pwr. This leak constitutes a disposal violation.

- 761.60(d) - 761.3 Disposal & Definition of PCB-Cont. Elec Equip. Level One Minor \$5000
Facility had in several locations out-of-service equipment that was not properly stored, dated, or marked.

Location #2 warehouse - capacitor:

- 761.65(b) Inadequate SFD Level Three Minor \$1000
- 761.65(c)(8) Stored item not dated Level Five Minor NC
- 761.40(a)(5) Unmarked capacitor Level Three Minor \$1000
- 761.40(a)(10) Unmarked storage area Level Three Minor NC

Location #3 warehouse - Capacitor

- 6.-9. Same as Violations 2.-5. total \$2000

Location #4 NW storage shed - Capacitor bank

- 10.-13. Same as Violations 2.-5. total \$2000

Location #4 NW storage shed - leaking transformer oil-filled

- 14.-15. Same as Violations 2.-3. total \$1000

16. Same as Violation 1. \$5000

Total \$17,000

Concur

Do not Concur

FATES INSPECTION #

DATE ENTERED

CASE #

DATE ENTERED



MAR 05 1990

Reply to
Attn Of: AT-083

MEMORANDUM

SUBJECT: TSCA Referral for Administrative Civil Penalty:
W.I. FOREST PRODUCTS

FROM: *Gil Haselberger*
Gil Haselberger, Chief
Toxic Substances Section

TO: Jackson Fox, Regional Counsel

THRU: *Kenneth D. Feigner*
Kenneth D. Feigner, Chief
Pesticides and Toxic Substances Branch

On October 11, 1989, an EPA inspection was performed by Michael Hoyles at W.I. Forest Products. The inspection was carried out to assess compliance with the PCB Regulations adopted by EPA pursuant to the Toxic Substances Control Act (TSCA).

During the inspection, violations of the regulations were noted, as listed in the attached proposed civil complaint.

Request for Action

This assessment is being referred to you for consideration of enforcement action. An Administrative Civil Penalty appears to be in order because of the significance of the violations. Following is a Civil Penalty Assessment for documented violations of TSCA.

I. Description of Current Alleged Violations

1. Violation - Disposal
Level - One
Extent - Minor
Penalty - \$5,000
2. Violation - Storage (inadequate storage for disposal (SFD)
area)
Level - Three
Extent - Minor
Penalty - \$1,000
3. Violation - Storage (dating)
Level - Five
Extent - Minor
Penalty - \$0 (Not charged, category & circumstances
same as Violation 2)

4. Violation - Marking (PCB item)
 Level - Three
 Extent - Minor
 Penalty - \$1,000
5. Violation - Marking (SFD area)
 Level - Three
 Extent - Minor
 Penalty - \$0 (Not charged, category & circumstances
 same as Violation 4)
6. Violation - Storage (inadequate SFD area)
 Level - Three
 Extent - Minor
 Penalty - \$1,000
7. Violation - Storage (dating)
 Level - Five
 Extent - Minor
 Penalty - \$0 (Not charged, circumstances
 same as Violation 6)
8. Violation - Marking (PCB item)
 Level - Three
 Extent - Minor
 Penalty - \$1,000
9. Violation - Marking (SFD area)
 Level - Three
 Extent - Minor
 Penalty - \$0 (Not charged,
 same as Violation 8)
10. Violation - Storage (inadequate SFD area)
 Level - Three
 Extent - Minor
 Penalty - \$1,000
11. Violation - Storage (dating)
 Level - Five
 Extent - Minor
 Penalty - \$0 (Not charged, circumstances
 same as Violation 10)
12. Violation - Marking (PCB item)
 Level - Three
 Extent - Minor
 Penalty - \$1,000

13. Violation - Marking (SFD area)
 Level - Three
 Extent - Minor
 Penalty - \$0 (Not charged,
 same as Violation 12)
14. Violation - Storage (inadequate SFD area)
 Level - Three
 Extent - Minor
 Penalty - \$1,000
15. Violation - Storage (dating)
 Level - Five
 Extent - Minor
 Penalty - \$0 (Not charged, circumstances
 same as Violation 14)
16. Violation - Disposal
 Level - One
 Extent - Minor
 Penalty - \$5,000

II. Initial Penalty Assessment

	<u>Regulation</u>	<u>Requirement</u>	<u>Penalty Amount</u>
1.	40 C.F.R. §§ 761.60 & 761.3	Disposal & Definitions	\$5,000
2.	40 C.F.R. § 761.65(b)	Storage (SFD)	\$1,000
3.	40 C.F.R. § 761.65(c)(8)	Storage (Dating)	\$0
4.	40 C.F.R. § 761.40(a)(5)	Marking (PCB item)	\$1,000
5.	40 C.F.R. § 761.40(a)(10)	Marking (SFD)	\$0
6.	40 C.F.R. § 761.65(b)	Storage (SFD)	\$1,000
7.	40 C.F.R. § 761.65(c)(8)	Storage (Dating)	\$0
8.	40 C.F.R. § 761.40(a)(5)	Marking (PCB item)	\$1,000
9.	40 C.F.R. § 761.40(a)(10)	Marking (SFD)	\$0
10.	40 C.F.R. § 761.65(b)	Storage (SFD)	\$1,000
11.	40 C.F.R. § 761.65(c)(8)	Storage (Dating)	\$0
12.	40 C.F.R. § 761.40(a)(5)	Marking (PCB item)	\$1,000

<u>Regulation</u>	<u>Requirement</u>	<u>Penalty Amount</u>
13. 40 C.F.R. § 761.40(a)(10)	Marking (SFD)	\$0
14. 40 C.F.R. § 761.65(b)	Storage (SFD)	\$1,000
15. 40 C.F.R. § 761.65(c)(8)	Storage (Dating)	\$0
16. 40 C.F.R. §§ 761.60 & 761.3	Disposal & Definitions	<u>\$5,000</u>
T O T A L		\$17,000

The TSCA Case Reviewer assigned to this case is Elaine Barrick, 2-8577.

Attachment

W. I. Forest Products
Long Lake Division
E. 2300 Mallon Avenue
P.O. Box 3344
Spokane, Washington 99220

Date: October 11, 1989

Michael R. Hoyles, Environmental Protection Specialist
Washington Operations Office

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NOV 09 1989

PESTICIDES & TOXIC
SUBSTANCES BRANCH
EPA REGION 10

Epilogue

In a January 13, 1989 letter to Gil Haselberger of EPA from Gary Miller, Fire Marshal, Fire Prevention Bureau, W. 44 Riverside Avenue, Spokane, Washington 99201, reference was made to transformers at this facility that had been registered with the Spokane City Fire Department. According to their records there were two Pyronol transformers and four transformers with unknown constituent located at this facility. Part of the reason for this inspection is to verify this information and also to do a full PCB inspection.

Compliance History:

None.

Pre-Inspection Conference:

I arrived at the facility and met John Artechevarria, Plant Manager. I presented my credentials and explained the purpose of my visit. I filled out the TSCA Notice of Inspection and Confidentiality Notice, had him fill out and sign the appropriate areas, and gave him a copy of each.

John introduced me to Joe Talley, electrician who showed me the various electrical equipment during the inspection. Neither of these two individuals were familiar with TSCA regulations and basically are operating electrical equipment that has always operated without problems.

Record Review:

None.

Inspection of Facility:

There were six transformers located in an enclosed area referred to by Joe as the sawmill, boiler room, chipper substation. The first transformer was a Westinghouse 333 KVA (S/N 6329354) oil-filled transformer (158 gallons). It was leaking. The second transformer was a Westinghouse 333 KVA (S/N 6329355) oil-filled (158 gallons) transformer. Almost the entire east face of the unit showed evidence of leaking.

WP 54
disp V.1
34
WP 55
disp V.2
13

WWP 53
disp V.3
9.2
23
27 V.4
21
157 V.5
22 V.4
53
The third unit was a Westinghouse 333 KVA (S/N 6329353) oil-filled (158 gallons) transformer. It had leaks around the gauges at the top of the unit.

The fourth unit was a Spokane 333 KVA (S/N S700623N) oil-filled (107 gallons) transformer. It had evidence of leakage around the bottom of the unit.

The fifth and sixth units were both Spokane transformers similar to the fourth unit with the S/Ns S700621N and S700622N, respectively. Both units were leaking. For safety reasons additional information could not be obtained from the name plates. Because of the consecutive nature of the serial numbers I think it is safe to say that they were also oil-filled transformers. This substation is not noted on the enclosed map.

low volt.
disp
mark adv.
We next went to the saw dust conveyor system area where there was a General Elecetric 10 KVA (S/N 4238776) 10-C oil-filled (15 gallons) transformer. It was not leaking. At this location there was also a capacitor cabinet that was approximately five feet high, four feet wide and one foot deep. The name plate said Ideal Electric, Pollyphase capacitors, 460 volts, 120 KVA with S/N 97517. The unit was not leaking and there were no M/L labels. This is number 1 on the enclosed map.

WWP
63 660/237
disp V.7
65 180/257
disp V.8
66 250/140
3rd not leaking
We next went to the planer area where there were three transformers platform-mounted on two telephone poles. Two of the three units were leaking and with the use of a spotting scope I was able to read the S/N of one of the leaking units. This was C383365. It was on the west end of the three. The other two units had similar S/Ns but I could not make out the exact numbers. There were no M/L labels on these units.

low volt.
WI disp
mark adv.
Finally, at the north end saw mill there were located a capacitor cabinet similar to the one discussed above. According to the name plate it also was an Ideal Electric 460 volt, 120 KVA pollyphase capacitor (S/N 97517). It was not leaking and did not have a M/L label. This is number 6 on the enclosed map.

None of the electrical equipment at this facility had M/L labels.

Sample Collection:

None.

Closing Discussion:

I met with John and Joe and discussed my concern with the six transformers at the substation and the three platform-mounted transformers. I was informed that all of these were owned and operated by the Washington Water Power Company. Since I realized that these two gentlemen were not familiar with TSCA regulations, I told them that if for any reason they decide to remove, dispose of or permanently disconnect any of their capacitors or transformers, there are specific federal regulations requiring this work. I stressed the importance of dating the units as to when they were removed from service, storing them in containment, indicated they must be properly disposed of within a year, and suggested that prior to removal they should contact EPA for guidance. I left them my business card, thanked them for their time and left the facility.

Prologue

Because the January 13, 1989 letter from the fire prevention bureau to EPA referenced two Pyronol transformers and four transformer with unknown constituent, indicating six transformers at this facility and further complying two of these were PCB transformers, I decided to investigate further. I went to the fire prevention bureau at W. 44 Riverside Avenue, Spokane, Washington, to talk to Gary Miller, Fire Marshall. I learned that he was on leave but that, perhaps, a Mr. Terry Reed could help me, but, he would not be in until tomorrow. On October 12, 1989, I called Terry Reed at (509) 456-2694 to discuss the documentation of these transformers.

After several attempts, I contacted the fire department by telephone on 10/18/89 and on 10/23/89 I received a map from the Spokane Fire Department showing the location of the transformers and capacitors that were registered with them. because of inconsistencies between the map and what I saw, I returned to spokane on 11/6/89 to revisit the plant. I discussed the map with Mr. Artechevarria and Mr. Talley and Mr. Talley took me to the locations 2, 3, 4 and 5.

*I mark V4.5.
stor. V2.3.* Location number 2 is in a warehouse that has not been used "for years". Next to a large fan was a General Electric, 15 KVR, 460 V, Pyranol (S/N M115251) capacitor. It was 24" high, 12" wide and 4" deep. It was still connected. There was not ML label and it was not leaking. The fan had not be in operation for at least 4 years according to Mr. Talley.

*I mark V8.9.
stor V4.7.* Location number 3 is also in the warehouse and is a Cornell Dubilier Electric Corp., 120 KVA, 460 V, (S/N 1414366) unit. There was not indication of liquid type and no ML label. It was not leaking. It was still connected. As with Number 2, it had not been used in years.

*I mark V12.13
stor V10.11.* Location number 4 is in the northwest storage shed on the west end of the maintenance shop. There in the the capacitor discussed on the map. It is a General Electric, 20n KVAR, Pyronal (S/N M93979) capacitor bank. The unit was designed for four capacitors but only three were there. Each was 17" high, 15" wide and 5" deep. There were no ML labels and they were not leaking. They were sitting on the ground. They were not dated as to when removed from service.

*I disp V16.
stor V14.15.* Also in this shed was a leaking General Electric, 10 KVA (S/N 2839715) transformer. The label indicated it contained 10.5 gal of #10 oil. It was on a pallot. It was not dated as to when removed form service.

I disp V1. Location number 5 was a pole mounted transformer that was leaking. There was not ML labels and it appeared to be in service.

When I finished recording data and taking photographs, Mr. Artechevarria had left the plant so I discussed what I found with Mr. Talley. I thanked him for this time and left the facility.

I then went to Washington Water Power and talked with Betty A. Riesenber, Environmental Compliance Coordinator, and gave her the information I had on the nine transformers the company had said belonged to them. She promised to look into it and I left. Later, she faxed me information on the three pole mounted units that are enclosed. It is my sense, from talking to her, that all nine of the units belong to Washington Water Power.



Washington Water Power

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NOV 21 '89

EPA-W00

TELECOPY TRANSMITTAL:

TO:

NAME: Michael Hayles

COMPANY: Air & TSCA Program

PHONE NUMBER: (206) 753-9079

TELECOPIER NUMBER: (206) 753-8080

FROM:

NAME: Betty Riesenber

DEPARTMENT: Licensing & Environmental Affairs

PHONE NUMBER: (509) 482-4738

DATE SENT: 11-21-89

NUMBER OF PAGES (INCLUDING COVER): 4

If you do not receive all the pages, please call the sender or our telecopy operator, Sherri Lemon at (509) 482-4168.

The Washington Water Power Company telecopier is a Sharp FO-620.

The phone number is (509) 482-4879.

WWP
Washington Water Power
1889-1989

Bob D. Anderson
Manager
Licensing & Environmental Affairs

November 21, 1989

Michael Hayles
Air & TSCA Program
Coordinator

RE: W-I Forest Products

Dear Mr. Hayles:

Last weekend we were able to replace transformers:

S700623N	BB 5454
S700621N	BB 5455
S700622N	BB 5456

with non PCB transformers at the W-I Forest Products site. At this time, we are not planning on replacing the 3 mounted transformers:

C383368	SA 8024
C383363	SA 8023
C383365	SA 8025

SA 8025 was wiped down because it did not have a film around the spiket.

Attached are the test results from the original 9 transformers.

Please contact me if additional information is needed. Thank you.

Sincerely,

Betty Riesenberg

Betty Riesenberg

pjl

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4150 PACIFIC HIGHWAY EAST, SUITE 114, TACOMA, WASHINGTON 98404-1110 FAX (206)822-8047

Report To: Washington Water Power

Date: November 14, 1989

Report On: PCB in Oil

Lab No.: 8508

IDENTIFICATION:

Samples Received on 11-14-89

C-814 P0890103

Site: Dahl

ANALYSIS:

Laboratory Sample No.	Client Identification	IGC Type	PCB (mg/kg)
Rush 1	LA4714-8800140N	----	6.1
Rush 2	BB5454 23	1260	27
Rush 3	BB5456 22	1260	53
Rush 4	BB5455 21	1260	157

SOUND ANALYTICAL SERVICES

Brent Hepner
BRENT HEPNER

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4630 PACIFIC HIGHWAY EAST, SUITE B-14, TACOMA, WASHINGTON 98404 • TELEPHONE (206) 333-3310 FAX (206) 333-5117

Report To: Washington Water Power

Date: November 9, 1989

Report On: PCB in Oil

Lab No.: 8447

IDENTIFICATION:

Samples Received on 11-09-89

C-814 PO890103

Site: Dahl

ANALYSIS:

Laboratory Sample No.	Client Identification	PCB Type	PCB (mg/kg)
Rush 1	SA3758 6329353	1260	9.2
Rush 2	SA3760 6329355	1260	13
Rush 3	SA80 ² / ₄ C383368	1260	256 160
Rush 4	SA8023 C383363	1260	237 160
Rush 5	SA3759 6329354	1260	34
Rush 6	SA8025 C383365	1260	253 180

SOUND ANALYTICAL SERVICES

Brent Hepner
BRENT HEPNER

FAX TRANSMISSION

TO: Michael Hayles
COMPANY: EPA - air + TSCA Program
FAX NUMBER: (206) 753-8080
NUMBER OF PAGES (INCLUDING COVER): 3
REGARDING: _____

FROM: Betty Rosenberg
COMPANY: Washington Water Power - Spokane
FAX NUMBER: _____

Fax # (206) 753-8000

Michael Hayles

11-7-89 Air & TSCA Program

Coordinator

(206) 753-9079

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NOV 07 '89

EPA-W00

Mr. Hayles -

attached are the test results for
3 of the transformers at W-I Forest
Products. Our linemen will take
samples from the rest of the
equipment on Wed, 11/8/89. We will
rush the samples to the lab. The
lineman will also do cleanup on
the equipment when he takes the
samples. I will fax the results
when we ~~are~~ receive them.

I will talk to you on Monday
or ~~that~~ sooner if you need
to visit.

Thank you,
Betty Kleinberg
WWP

FEB 15 1988

ANALYTICAL ASSOCIATES
4011 POWER INN RD. SUITE G
SACRAMENTO, CA. 95826
(916) 451-5034

10 FEB 88
REPORT NO. 18403

WASHINGTON WATER POWER CO.
P.O. BOX 3727
SPOKANE, WA 99220

ATTN: TIM CARLBERG

THE POLYCHLORINATED BIPHENYL (PCB) CONTENT OF THE SAMPLE(S) RECEIVED ON 1 FEB 88 IS TABULATED BELOW. ALL SAMPLES WERE ANALYZED IN ACCORDANCE WITH USEPA METHOD 8080. THE DETECTION LIMIT FOR THIS ANALYSIS IS 1 PPM OF PCB IN OIL, 0.1 PPM IN SOIL & 0.01 PPM IN WATER.

SAMPLE IDENTIFICATION	PCB CONTENT (PPM)	AROCLOR
SA-8023 C383363	160	1260
SA-8025 C383365	190	1260
SA-8024 C383368	160	1260

IF YOU HAVE ANY QUESTIONS ABOUT THESE RESULTS, PLEASE CONTACT ME-OR MY ASSOCIATES.


DAVE HANSON

SEPA

EB

SEPA

Add
Change
Delete

10-11-89 3122 #1 LPF

Requested by: Yvonne Spriggs
Date: 11/14/89

FATES/FTTS

FINDS Input Form

EPA ID Number:	<u>WAD 038527503</u>		
Facility Name:	<u>W I FOREST PRODUCTS</u>		
Street:	<u>E 2306 Mallon Avenue</u>		<u>99202</u>
City:	<u>SPOKANE</u>	State: <u>WA</u>	Zip Code: <u>99220</u>
County Code :	<u>059</u>	Congressional District :	
Owner Type :	<u>X</u> <u>P</u>	Operator Type :	
Latitude :		Lat-Long Source :	
Longitude :		Lat-Long Accuracy :	
SIC Codes :	<u>N</u> :		
Indian Land :	<u>N</u> (Y,N)	Federal Facility :	<u>N</u> (Y,N)
Comments :			
HWDMS (OSW) :			
PCS (OWEP) :			
CDS (OAR) :			
FATES (OPTS) :	<u>X</u>		
CERCLIS (OERR) :			
DOCKET (OECM) :			
FURS (OW) :			
FRDS (ODW) :			
SIA :			
HWCTDB (OSW) :			
CICIS (OTS) :			
STATE SYS :			

Date Received: 11/14 Loaded by: pet
Assigned: _____ Date: 11/14/89
Date: _____ Verified by: _____
Logged: _____

R

DATE ___/___/___

FTTS PCB INSPECTION AND CASE REVIEW RECORD

LEGISLATION:

INSPECTION DATE:

INSPECTOR NUMBER:

INSPECTION SEQUENCE:

INSPECTOR NAME:

T

10/11/89

3122

1

HOYLES

STATUS:

ACTIVE

TYPE:

6PF / 6PS

REASON:

NSR

FUNCTION:

US

DATE RECEIVED:

___/___/___

CBI ?:

Y / N

FEDERAL SITE ?:

Y / N

SIC CODE:

24

N I S:

3

REMARKS:

NUMBER OF SAMPLES:

NAME:

ADDRESS:

CITY:

STATE:

DUNS NUMBER:

W.I. FOREST PRODUCTS

SPOKANE

COUNTY:

WA

ZIP:

MAIL/PARENT CO. NAME:

ADDRESS:

CITY:

STATE:

ZIP:

CASE REVIEWER:

REVIEW STARTED:

REVIEW COMPLETED:

VIOLATION ?:

DOCKET NUMBER:

CASE NUMBER:

Y / N

10-88

VIOLATION CODE

ACTION:

ACT:DATE

RES:DUE1

RES:REC1

TSCA FACILITY FUNCTION CODES

CODE	DESCRIPTION
BK	BROKER
CV	CONVEYOR
DA	PERMITTED DISPOSER - ALTERNATIVE METHODS
DH	PERMITTED DISPOSER - HIGH EFFIC BOILERS
DI	PERMITTED DISPOSER - INCINERATOR
DL	PERMITTED DISPOSER - LANDFILL
DM	PERMITTED DISPOSER - DREDGE/SLUDGE WATER
DP	DISPOSER
DR	PERMITTED DISPOSER - RESEARCH/DEVELOP
DT	DISTRIBUTOR
LB	LABORATORY
MI	MANUFACTURER/IMPORTER
MM	MANUFACTURER
PC	PROCESSOR
PS	SECONDARY PROCESSOR
PT	PORT OF ENTRY
ST	STORER
US	USER

RECEIVED

January 13, 1989 JAN 18 1989

PESTICIDES & TOXIC
SUBSTANCES BRANCH
EPA REGION 10

Mr. Gil Haselberger, Chief
Toxic Substances Section
U. S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101



Dear Mr. Haselberger:

I am responding to your letter of 12/30/88 concerning the registration of PCB transformers that have been registered with the Spokane City Fire Department. Our records show the following registrations:

1. Deaconess Medical Center, W. 800 Fifth Ave. - four transformers of unknown principal constituent located as follows:
 - A. NW basement.
 - B. Chiller building - upper-deck.
 - C. Sherwood Bldg. - courtyard area.
 - D. South wing roof.

The contact person listed is Richard Mabbott, Director of Physical Plant, phone (509) 458-5800.

2. Gonzaga University - PCB transformers located as follows:
 - A. Madonna Hall, N. 1000 Cincinnati St. - three transformers 37KVA askarel transformers.
 - B. Student Union Bldg., E. 700 Desmet Ave. - one transformer aroclor (contaminated 378 parts per million).
 - C. St. Catherine/Monica Hall, N. 900 Cincinnati St. - one recovery drum storing miscellaneous equipment for maintenance, etc. PCB transformers.

Contact person is Ken Sammons, Director of University Services, E. 220 Boone Ave., phone (509) 328-4220.

3. City Water and Hydroelectric Services Dept. - Barter Well Station, N. 4401 Aubrey L. White Parkway - one transformer unspecified principal constituent. Contact person is Mike Melville, Plant Foreman, phone (509) 456-2645.

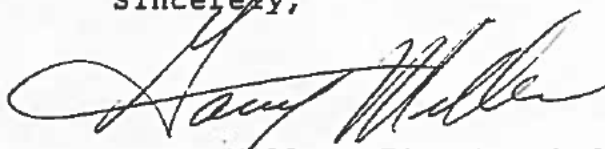
4. W. I. Forest Products, Long Lake Division, E. 2302 Mallon Ave. - two transformers principal constituent pyronol. Also, four transformers with an unknown constituent. This agency has no contact person or phone number listed.

5. Advanced Waste Water Treatment Plant, N. 4401 Aubrey L. White Parkway - four transformers non-specified constituent fluids. Contact person is John Snell, Maintenance Supervisor, phone (509) 456-4305.
6. Whitworth College, Spokane, WA 99251 - four transformers located as follows:
 - A. Arend Hall - unspecified constituent.
 - B. Warren Hall - unspecified constituent.
 - C. McEachron Hall - unspecified constituent.
 - D. Chapel - unspecified constituent.

Contact person is Don Holden, Physical Plant Director, phone (509) 466-1000.

I have answered your questionnaire as best I can at this date. I hope that this information is helpful.

Sincerely,



Garry Miller, Fire Marshal
Fire Prevention Bureau
W. 44 Riverside Ave.
Spokane, WA 99201
Telephone (509) 456-2694

GM/df



ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME	
DATE 10-11-89	INSPECTOR NO. 871	DAILY SEQ. NO.	WI FOREST PRODUCTS	
3. INSPECTOR NAME MICHAEL R HOYLES			4. FIRM ADDRESS LONG LAKE DIVISION E. 2306 MALLON AVE PO BOX 3344 SPOKANE, WA 99220	
5. INSPECTOR ADDRESS 2 Ecology PU-11 OLYMPIA WA 98504			6. CHIEF EXECUTIVE OFFICER NAME John ARTECHEVARRIA	
			7. TITLE PLANT MANAGER	

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:		If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.	
I have received and read the notice			
SIGNATURE 		NAME	
NAME John Artechavarria		TITLE	
TITLE MANAGER		ADDRESS	
DATE SIGNED 10-11-89			



ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE 10-11-89	INSPECTOR NO. 871	DAILY SEQ. NO.	10a	WI FOREST PRODUCTS
4. INSPECTOR ADDRESS Ecology PV-11 OLYMPIA WA 98504			5. FIRM ADDRESS LONG LAKE DIVISION E 2306 MALLON AVE PO BOX 3344 SPOKANE WA 99220	

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

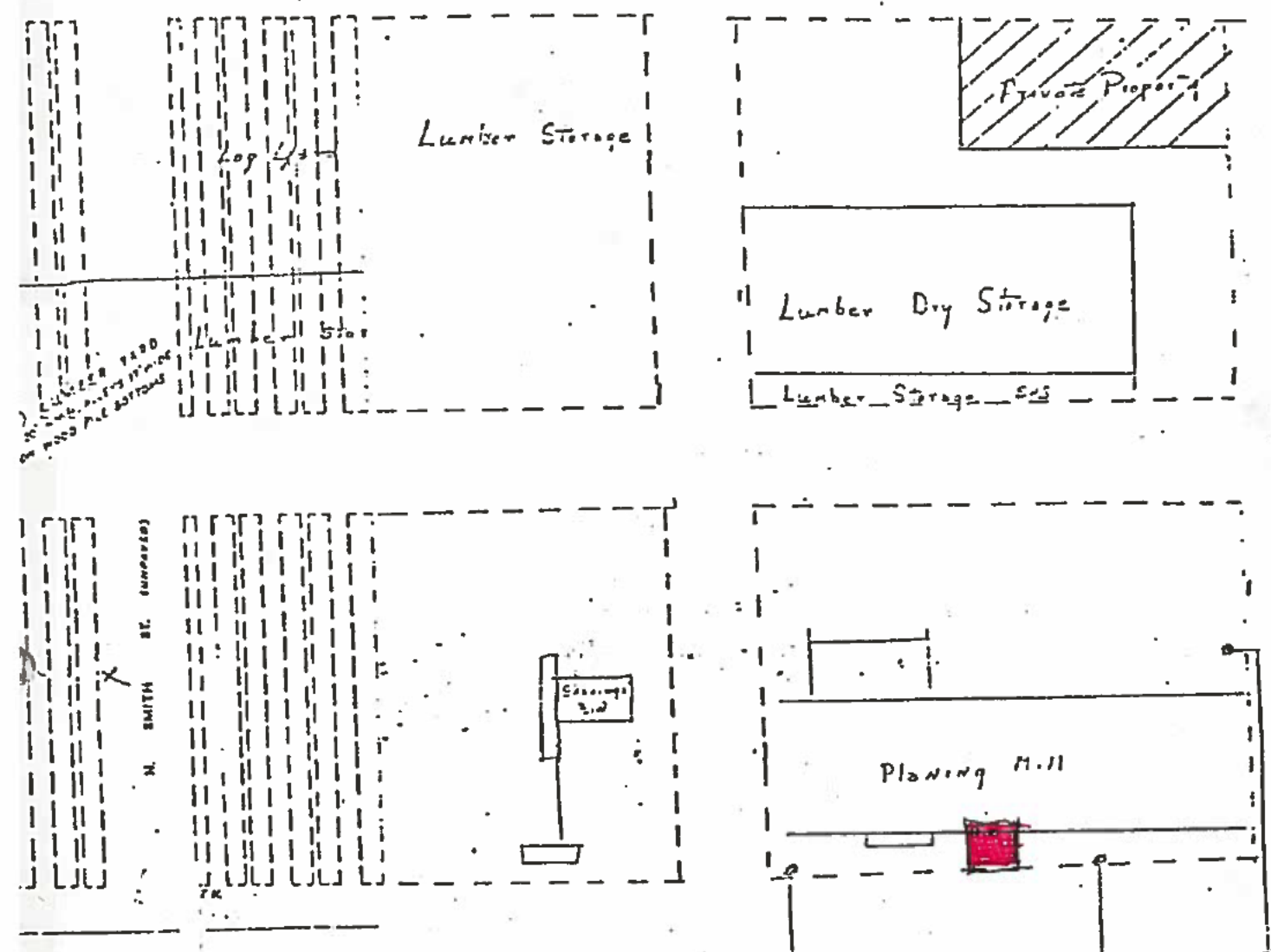
INSPECTOR SIGNATURE 		RECIPIENT SIGNATURE 	
NAME MICHAEL R HOYLES		NAME J. L. Antoschewski	
TITLE AIR & TSCA COORDINATOR	DATE SIGNED 10-11-89	TITLE Manager	DATE SIGNED 10-11-89

Long Lake Division

2302 E. Mallon

OCT 23 '89

EPA-WOO



1) oil filled transformer + capacitor
on ground just outside west
wall of sawmill building.

PCB's.

2) Pyranol Capacitor on overhead platform near large fan motor just off of stairway

3) Under overhead Buss Bar
inside warehouse from dry valve #4

4) Pyranol Capacitor stored in shed just west of maintenance shop

5) Wet Transformer on power at corner of Mallon and Pittsford

Transformer + capacitor
Northwest corner of
oil building

RECEIVED

OCT 23 '89

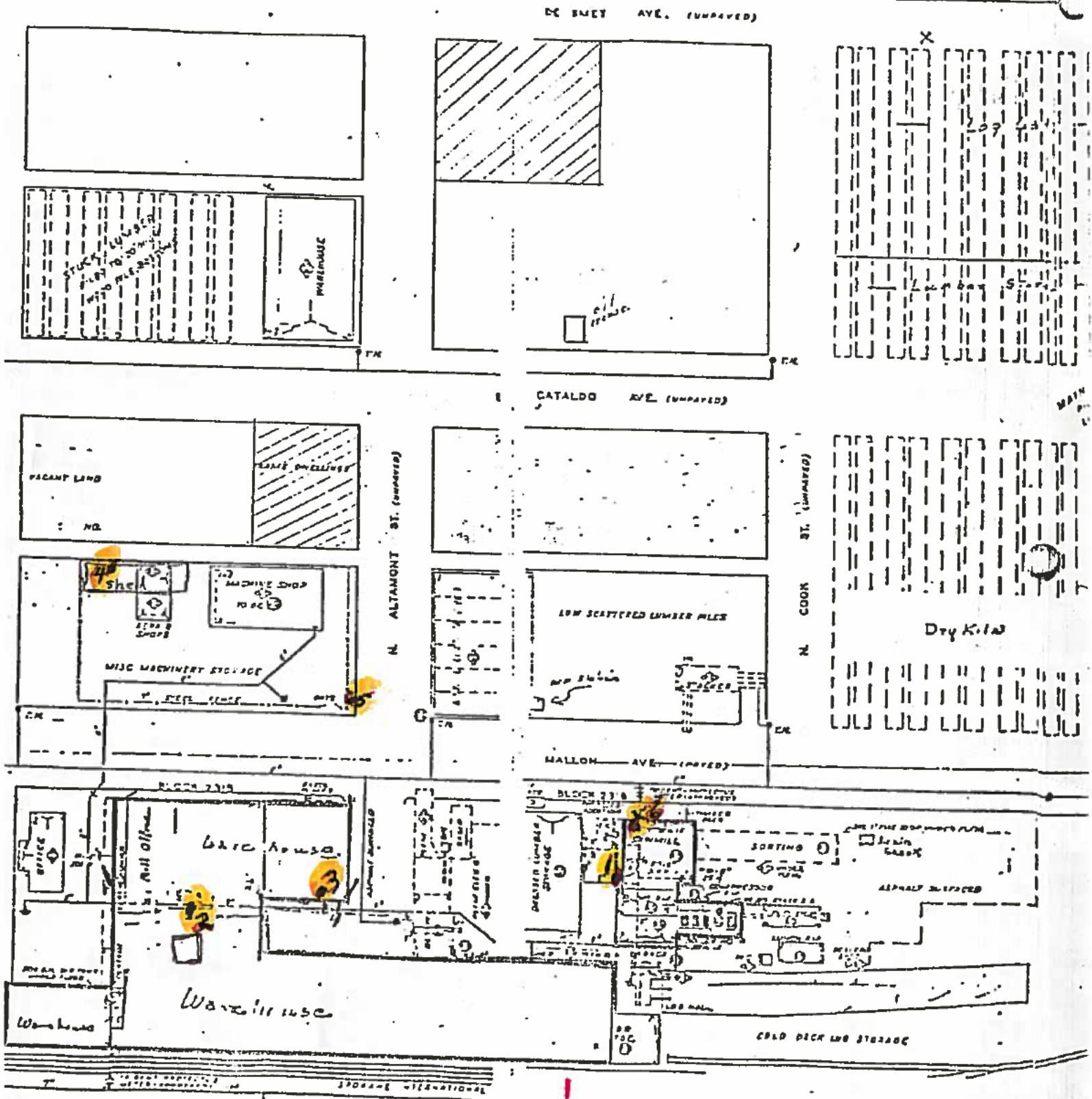
EPA-WOO

all of these transformers
and capacitors were visually
inspected by our plant electrician
in April of 1986 and found to
be in good condition - i.e. no leaks
or bulging.

Note from
W.I. Forest Products

RECEIVED
OCT 23 '89
EPA-WOO

Possible PCB Transfer
W I Forest Products

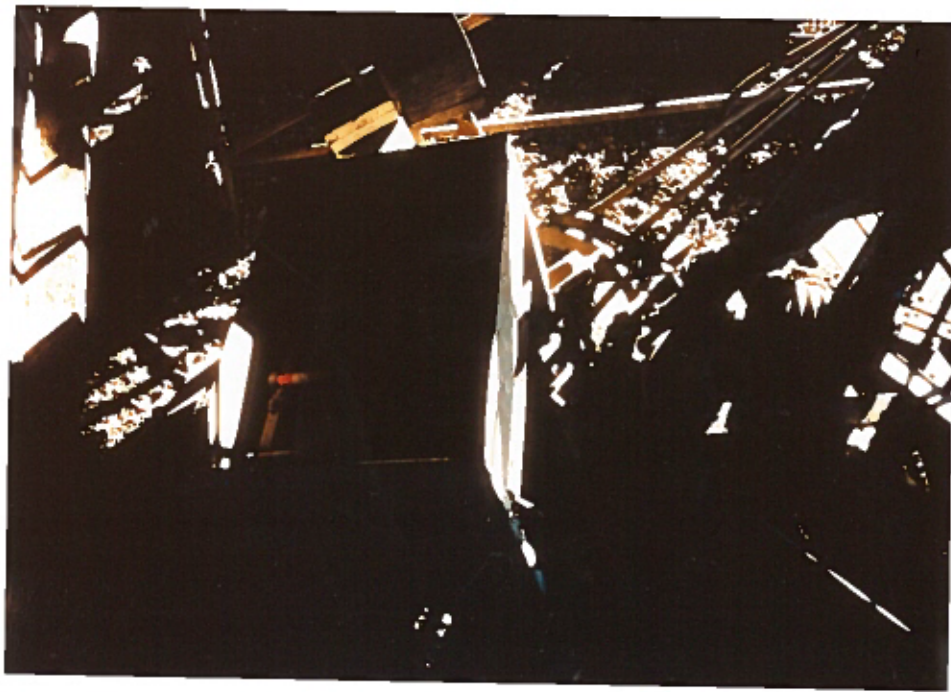


W I Forest Prod. - Bang Lake Div



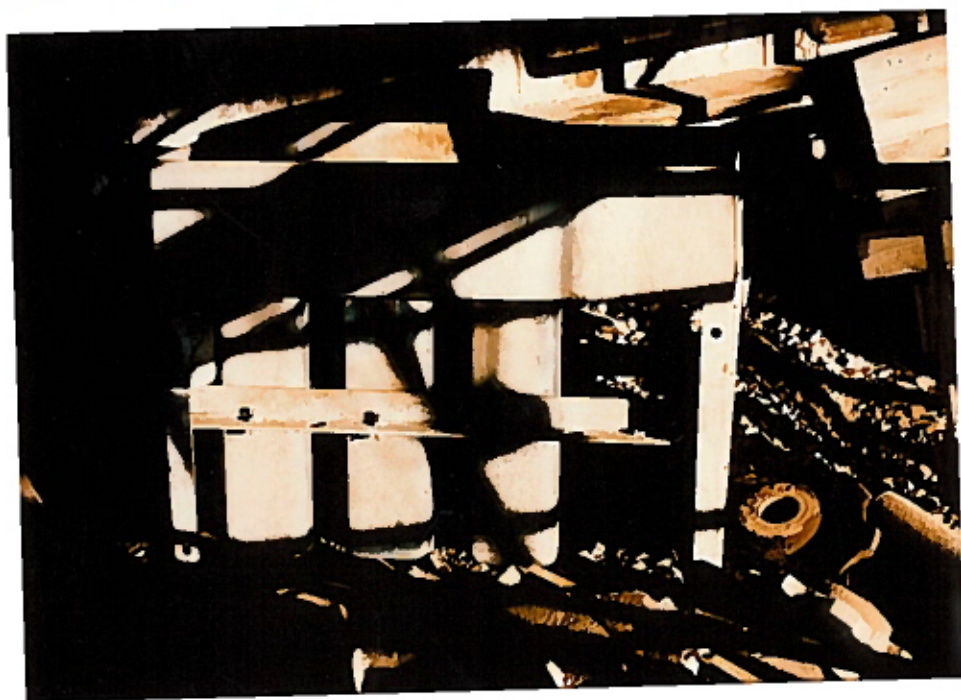
Indicates
access doors

6, wet
mud
saw

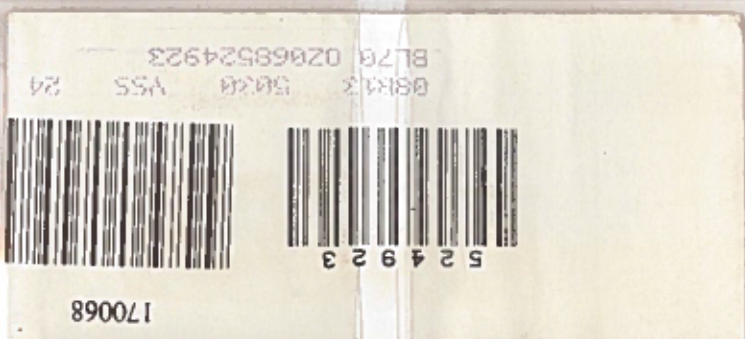
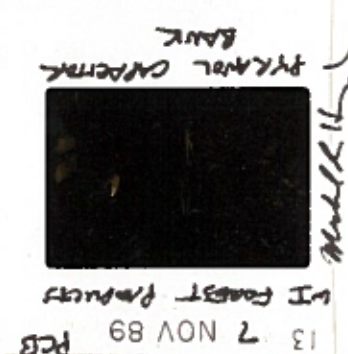
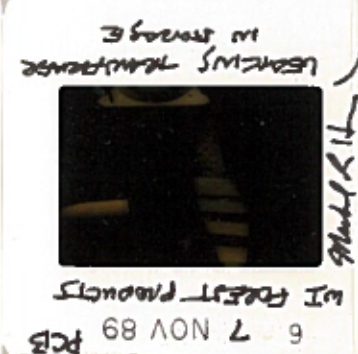
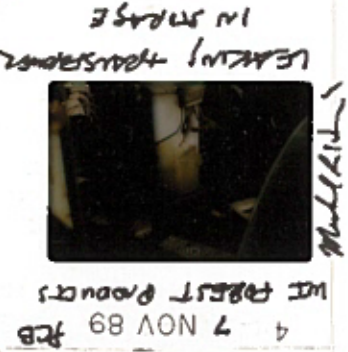












Other slides taken during insp. of Wash. Water Power equipment, are in WA H₂O Power file

